

EXHIBIT H

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1

2 IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----X

4 EASTERN PROFIT CORPORATION LIMITED,

5 Plaintiff/Counterclaim Defendant,

6 -against-

Case No.
18-cv-2185 (JGK)

7 STRATEGIC VISION US, LLC,

8 Defendants/Counterclaim Plaintiff,

9 -against-

10 GUO WENGUI a/k/a MILES KWOK,

11 Counterclaim Defendant.

12 -----X

13

14

15 VIDEOTAPED DEPOSITION OF

16 YVETTE WANG

17 New York, New York

18 October 30, 2019

19

20

21 ATKINSON-BAKER, INC.

COURT REPORTERS

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REPORTED BY: TERRI FUDENS

24

FILE NO: ADOABD6A

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1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 -----X
5 EASTERN PROFIT CORPORATION LIMITED,
6 Plaintiff/Counterclaim Defendant,
7 V.
8 STRATEGIC VISION US, LLC,
9 Defendants/Counterclaim Plaintiff.
10 -----X

15 Videotaped deposition of YVETTE WANG,
16 a 30(b)(6) witness taken on behalf of Eastern
17 Profit Corporation Ltd., the
18 Plaintiff-Counterclaim Defendant herein, taken by
19 the Defendant-Counterclaim Plaintiff pursuant to
20 Court Order held at 620 Eighth Avenue, New York,
21 New York, commencing at 9:55 A.M., Wednesday,
22 October 30, 2019, before Terri Fudens, a Stenotype
23 Reporter and Notary Public of the State of New
24 York.
25

Page 2

1
2 APPEARANCES CONTINUED:
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1 I N D E X
2 WITNESS: EXAMINATION BY: PAGES:
3 Yvette Wang Mr. Greim 15
4
5

6 E X H I B I T S
7 EXHIBIT: DESCRIPTION: PAGES:
8 Wang 30 Notice of Deposition 18
9 Wang 31 A Loan Agreement Bates stamped 97
10 Eastern-000278 to 280

11 EXHIBITS MARKED BUT PREVIOUSLY PRODUCED
12 EXHIBIT: DESCRIPTION: PAGES:
13 Guo 2 Limited Power of Attorney 41
14 Bates stamped Eastern-000276
15 and 277
16 Wang 2 Research Agreement dated 140
17 December 29, 2010 Bates
18 stamped Eastern-000005 to
19 Eastern 000009
20 Wang 4 A document titled Research 162
21 Agreement dated January 1,
22 2018 and Bates stamped
23 Eastern-000001 to Eastern-000004
24 Wang 3 A document titled Plaintiff 172
25 Eastern Profit Corporation
 Limited's Responses and
 Objections to Defendant Strategic
 Vision US, LLC's First Set of
 Interrogatories.

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2 (Pages 2 to 5)

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<p>1 2 EXHIBITS MARKED BUT PREVIOUSLY PRODUCED 3 EXHIBIT: DESCRIPTION: PAGES: 4 Wang 12 A Name List 186 5 6 *** EXHIBITS RETAINED BY COUNSEL *** 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 2 establish what knowledge each entity 3 had, because I think they're probably 4 coterminous, and then carve out -- 5 you know, I think I will quickly 6 identify any areas where they don't 7 have the same knowledge, that I would 8 knock those out. 9 10 But otherwise I would ask the 11 great majority of my questions of the 12 witness on behalf of both entities 13 and make that clear on the record. 14 That was the whole point of saving 15 time to do the same witness in the 16 same day. I think my opponents 17 object. I'll let them go. 18 ERIN TESKE: Your Honor, these 19 are two different depositions. 20 I'm sorry. This is Erin Teske 21 on behalf of Golden Spring, New York 22 today. 23 And these are two different 24 entirely depositions. And despite 25 what Mr. Greim believes in his heart, the information that the two entities</p>
<p>Page 6</p>	<p>Page 8</p>

<p>1 2 MR. GREIM: We are just on the 3 phone with Judge Freeman on the 4 Strategic Vision/Eastern Profit case. 5 JUDGE FREEMAN: This is Judge 6 Freeman. 7 MR. GREIM: Judge Freeman, we're 8 back in the conference room, and now 9 we have -- now we're on the record. 10 JUDGE FREEMAN: Okay. You've 11 given your appearances to the court 12 reporter? 13 MR. GREIM: Yes, we have. 14 JUDGE FREEMAN: All right. So 15 who has an issue before you even 16 started? 17 MR. GREIM: Right. Well, your 18 Honor, we were going to start 15 19 minutes early. And basically the 20 question is whether I must declare 21 that I am starting with one of the 22 two entities, finish all questions 23 for that entity and move on to 24 other one, or whether I can first 25 establish -- my plan was to first</p>	<p>1 2 have is not the same, and it is 3 different. And it's very confusing 4 for the witness who is wearing two 5 hats to try to decipher whether 6 Mr. Greim is asking questions in 7 which capacity if it's not made clear 8 that this is the deposition of 9 Eastern, and this is the deposition 10 of GSNY. 11 These should be being held on 12 different days, plus for the fact 13 that we're accommodating Mr. Greim's 14 request. 15 MS. CLINE: Your Honor, this is 16 Joanna Cline for Eastern Profit. I 17 concur with Miss Teske. 18 From our perspective, Mr. Greim 19 is again trying to argue the alterego 20 with the account that has been 21 dismissed, and conflate the two 22 entities. 23 And Miss Wang is here to testify 24 on behalf of two separate entities, 25 and in our view it should be two</p>
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3 (Pages 6 to 9)

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<p>1 separate depositions. 2 JUDGE FREEMAN: All right. Hold 3 on a second. I had issued an order, 4 which I assume you saw, where I said 5 that you can have another seven hours 6 with this witness, but I was assuming 7 that both depositions could be 8 completed within that time. 9 If the plaintiff and Golden 10 Spring really want these depositions 11 to be separate so that you might have 12 the exact same questions asked twice, 13 I'm not going to adhere to that 14 aspect of my ruling, and I'm not 15 going to limit Mr. Greim to one day 16 in order to complete both depositions 17 of both witnesses. 18 I will require Mr. Greim to 19 conduct them separately. And he may 20 be very repetitive and be using a lot 21 more of this witness' time. But you 22 will have more clarity of the 23 transcript, if that's what you want, 24 on the plaintiff's and non-party</p>	<p>1 that to Mr. Greim. I will tell 2 Mr. Greim to be reasonably tailored, 3 stay focused on the topics that I 4 permitted and the ones that were 5 agreed by the parties. 6 But the whole concept of 7 economies of scale, if you will, or 8 whatever you want to call it, 9 efficiency, was that this was one 10 witness who in some cases could 11 probably be speaking for both 12 entities in answering certain 13 questions. 14 You can probably cover it all 15 within seven hours. I think that 16 although one was a continuation, the 17 other one was not. And so the one 18 that was not is entitled to seven 19 hours if he wants to use them. 20 All right? 21 MR. GREIM: Thank you, Your 22 Honor. 23 MS. CLINE: Thank you, Your 24 Honor. 25</p>
<p>1 2 side. But the witness may have to 3 come back for more than one day. 4 MR. GREIM: Your Honor, I'll do 5 it either way. I felt very clear 6 that we were going to do it my way, 7 so to speak. But we'll be back again 8 for some other people, and we can do 9 one today and do the other later. 10 I'll just leave it right now to my 11 opponents. 12 JUDGE FREEMAN: I'll leave the 13 call also to plaintiff and the 14 non-party. If you really want to be 15 separated, that's fine, but I'm not 16 going to limit Mr. Greim then to one 17 day. The concept was that there 18 would be a lot that would be 19 overlapping. 20 ERIN TESKE: Your Honor, I think 21 the scope of the deposition for GSNY 22 is such that it doesn't -- it 23 shouldn't require another day. 24 JUDGE FREEMAN: But it may and 25 it may not, and I'm going to leave</p>	<p>1 2 MS. TESKE: Thank you, your 3 Honor. 4 JUDGE FREEMAN: You're welcome. 5 MS. CLINE: Let's go off the 6 record. 7 (At this time, a brief recess 8 was taken.) 9 THE VIDEOGRAPHER: Good morning. 10 I am Thomas Del Vecchio, your 11 videographer. I represent 12 Atkinson-Baker, Inc. in Glendale, 13 California. 14 I am not financially interested 15 in this action, nor am I a relative 16 or employee of any attorney or any of 17 the parties. 18 Today's date is Wednesday, 19 October 30, 2019. The time is 20 10:15 a.m. This deposition is taking 21 place at the office of Pepper 22 Hamilton, LLP, 620 Eighth Avenue, New 23 York, New York. 24 The case number is 18-CV-2185 25 entitled Eastern Profit Corporation</p>

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4 (Pages 10 to 13)

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<p>Limited, plaintiff/counterclaim defendant, versus Strategic Vision US, LLC, defendant/counterclaim plaintiff.</p> <p>The deponent today is Miss Yvette Wang.</p> <p>This deposition is being taken on behalf of defendant/counterclaim plaintiff.</p> <p>Your court reporter is Terri Fudens from Atkinson-Baker.</p> <p>Will counsel now please introduce themselves. After counsel have introduced themselves, the witness may be sworn in by the reporter.</p> <p>MR. GREIM: This is Eddie Greim and Jennifer Donnelly, counsel for Defendant/Counterclaimant Strategic Vision US, LLC.</p> <p>MS. CLINE: Joanna Cline, Pepper Hamilton, counsel for Eastern Profit and the witness.</p> <p>MR. GREIM: Could the record</p>	<p>YVETTE WANG 162 East 64th Street, New York, 10065.</p> <p>Q And is that your residence, or is that the address of Golden Spring New York?</p> <p>A This is the address of Golden Spring New York.</p> <p>Q What is your residential address?</p> <p>MS. CLINE: Objection. I'm not sure you need her residential address. If you need to get in touch with the witness, you can do so through our law firm.</p> <p>MR. GREIM: Well, counsel, in case we need to subpoena her at trial.</p> <p>MS. CLINE: She's here in her corporate capacity, not her individual capacity.</p> <p>MR. GREIM: So the witness declined to give her residential address?</p> <p>A Correct.</p> <p>Q You understand that you're here as the representative of Eastern Profit, the plaintiff/counterclaimant in this case --</p> <p>YVETTE WANG reflect that also sitting in the room with us today are Erin Teske, counsel for Golden Spring New York Ltd., as well as Daniel Podhaskie, who I understand to be general counsel of Golden Spring New York, Ltd. and is here.</p> <p>Mr. Podhaskie, could you state your purpose for being here?</p> <p>MR. PODHASKIE: Corporate representative of Eastern Profit.</p> <p>MR. GREIM: By virtue of the Power of Attorney?</p> <p>MR. PODHASKIE: Correct.</p> <p>Y V E T T E W A N G, a 30(b)(6) witness herein, having been first duly sworn by Terri Fudens, a Notary Public of the State of New York, was examined and testified as follows:</p> <p>EXAMINATION BY MR. GREIM:</p> <p>Q Miss Wang, could you give us your legal name and your address, please?</p> <p>A Legal name is Yvette Wang. Address,</p>
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<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q And have you similarly prepared yourself to answer questions on topics for today?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 You can go ahead and answer.</p> <p>6 A I believe I prepared for today.</p> <p>7 Q Now the topics on which you are to testify are listed in a Notice of Deposition which has been modified by a court order and by the agreement of the parties.</p> <p>8 (Wang Exhibit 30, Notice of Deposition previously marked for Identification as of this date.)</p> <p>9 Q So I'm going to hand you -- here we go. I'm going to hand you what we've marked as Exhibit 30, and I'm going to ask you to pass one over to your attorney.</p> <p>10 From now on I'm going to give you two</p> <p>11 copies of everything. One I want you to keep in</p> <p>12 front of you that has the actual number on it, and</p> <p>13 then just hand the other one over to your</p> <p>14 attorney. Okay?</p> <p>15 A I cannot. One you have an exhibit</p> <p>16 sticker. Another one you do not have. What do</p>	<p>1 YVETTE WANG</p> <p>2 Q Your first deposition was January 31, 2019.</p> <p>3 A It's about 10 months ago; right?</p> <p>4 Q Almost.</p> <p>5 A Okay. Thank you for reminder.</p> <p>6 Q Okay. And you prepared today for a narrower set of topics than those seven; is that right?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A Can you repeat again?</p> <p>9 Q You prepared today for a narrower set of topics than those seven; correct?</p> <p>10 A You mean this seven topics? They</p> <p>11 were the topics in my first deposition --</p> <p>12 Q Right.</p> <p>13 A -- about 10 months ago.</p> <p>14 Q Right.</p> <p>15 A And you're asking me did I prepare</p> <p>16 less than seven topics for today. Is that your</p> <p>17 question?</p> <p>18 Q Sure.</p> <p>19 A The answer is yes.</p> <p>20 Q Okay. Now before your last deposition, you had not spoken with a</p>
<p style="text-align: center;">Page 18</p> <p>1 YVETTE WANG</p> <p>2 you want to do with this?</p> <p>3 Q I want you to keep the exhibit sticker one in front of you.</p> <p>4 A Okay.</p> <p>5 Q And I'm going to hand you -- I want you to hand the other one to your attorney.</p> <p>6 A This one; right?</p> <p>7 Q Yes. It just occurred to me that that will be the easier way to do this.</p> <p>8 <p style="padding-left: 40px;">Now if you look on the third page of this, do you see a listing of topics?</p> <p>9 A Yes. There are topics here.</p> <p>10 Q Okay. Listen to my question carefully here.</p> <p>11 <p style="padding-left: 40px;">These are the seven topics that you originally prepared for on your first deposition; isn't that right?</p> <p>12 MS. CLINE: I'm going to object.</p> <p>13 Her original deposition was a year</p> <p>14 ago or January of this year. Excuse</p> <p>15 me. This isn't really a memory test,</p> <p>16 so I wish we could just move along</p> <p>17 and get to the substance.</p> <p>18 A When was my first deposition?</p> </p></p>	<p style="text-align: center;">Page 20</p> <p>1 YVETTE WANG</p> <p>2 representative of Eastern Profit; correct?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A What's the question?</p> <p>5 Q Before your last deposition, you had not spoken with a representative of Eastern Profit; correct?</p> <p>6 A Before my last deposition? I don't</p> <p>7 remember that. 10 months ago is a long time.</p> <p>8 MS. CLINE: She's going to</p> <p>9 object to the line of questioning.</p> <p>10 The judge has already given you the</p> <p>11 opportunity to take additional time</p> <p>12 with this witness.</p> <p>13 I'm not sure why you need to</p> <p>14 establish the extent to which she was</p> <p>15 prepared the last time. Let's just</p> <p>16 move to the substance.</p> <p>17 MR. GREIM: Please.</p> <p>18 Q Who have you spoken with to prepare for today?</p> <p>19 A My lawyers.</p> <p>20 Q Who are your lawyers?</p> <p>21 A Joanna right here.</p> <p>22 Q Who else?</p>

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<p>1 YVETTE WANG</p> <p>2 A Just my lawyer, I believe.</p> <p>3 Q So only with Miss Cline?</p> <p>4 A Yes.</p> <p>5 Q Now did you speak with any nonlawyers in preparation for your testimony today?</p> <p>6 A For today?</p> <p>7 Q Mm-hmm.</p> <p>8 A No, I didn't.</p> <p>9 Q Did you speak with any representative of Eastern Profit other than Miss Cline in preparation for your deposition today?</p> <p>10 MS. CLINE: Objection to form.</p> <p>11 A I briefly ask some question.</p> <p>12 Q Okay. Of whom?</p> <p>13 A The director and a representative of Eastern Profit.</p> <p>14 Q Okay. Are those two different people or the same person?</p> <p>15 A Two different people.</p> <p>16 Q Who is the director of Eastern Profit that you spoke with?</p> <p>17 A Mei Guo. M-E-I G-U-O.</p> <p>18 Q Okay. And who is the representative that you spoke with?</p>	<p>1 YVETTE WANG</p> <p>2 A A business woman.</p> <p>3 Q She's Guo Wengui's daughter; correct?</p> <p>4 A Correct.</p> <p>5 Q And she is the sole director of Eastern Profit; is that correct?</p> <p>6 A Correct.</p> <p>7 Q Why did you -- well, let me ask you this.</p> <p>8 Did you speak to her in person or over the phone?</p> <p>9 A I don't remember clearly. Should be like in person, yeah.</p> <p>10 Q And is it your testimony that you do not remember what you spoke to her about?</p> <p>11 A Is there any problem? Like a couple of months ago if you ask me specific question, I may be able to recall my memory about that conversation because we met and we talk a lot. I don't know which is the answer you ask.</p> <p>12 Q Okay. So it was a long conversation with Mei Guo?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A I don't remember.</p> <p>15 Q I'm trying to understand, you said</p>
<p>1 YVETTE WANG</p> <p>2 A Mr. Han, H-A-N.</p> <p>3 Q Is this Mr. Han Chunguang?</p> <p>4 A Correct.</p> <p>5 Q C-H-U-N-G-U-A-N-G; right?</p> <p>6 A C-H-U-N-G-U-A-N-G, yes.</p> <p>7 Q Does he sometimes go by Hank Han?</p> <p>8 A I don't know his English name.</p> <p>9 You're talking about his English name?</p> <p>10 Q Yes. You never heard him called Hank before?</p> <p>11 A I don't know that name.</p> <p>12 Q When did you speak with Mei Guo?</p> <p>13 A I don't remember clearly. Like a couple of month ago.</p> <p>14 Q Was it in preparation for this deposition?</p> <p>15 A I believe not because this deposition was just ordered like a couple of days ago. How I can prepare this deposition, it involves like a couple of month.</p> <p>16 Q What did you speak with Mei Guo about?</p> <p>17 A I don't remember clearly.</p> <p>18 Q Who is she?</p>	<p>1 YVETTE WANG</p> <p>2 you met and you talked a lot. What did you talk about?</p> <p>3 A I don't understand your question.</p> <p>4 Q Did you talk a lot with Mei Guo when you spoke with her a few months ago?</p> <p>5 A I don't understand your question.</p> <p>6 Q Where were you when you spoke with Mei Guo in person a couple of months ago?</p> <p>7 A In New York.</p> <p>8 Q Where in New York?</p> <p>9 A A restaurant.</p> <p>10 Q Okay. Who else was with you?</p> <p>11 A Just myself and her.</p> <p>12 Q Had you met her before?</p> <p>13 A Yes.</p> <p>14 Q Was this a social meeting or a business meeting?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 A What is your definition? What is social meeting? What is business meeting?</p> <p>17 Q What was the purpose of your meeting?</p> <p>18 A I don't understand your question.</p> <p>19 Q Why did you meet with her?</p> <p>20 A To ask her what is about Eastern</p>

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7 (Pages 22 to 25)

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<p>1 YVETTE WANG 2 Profit. 3 Q Okay. So the purpose of the meeting 4 was to ask her about Eastern Profit? 5 A Kind of. 6 Q Okay. Well what was the other 7 purpose of the meeting? 8 A Chat about the Chinese Communist 9 Party took more action mainland of China to 10 persecute my colleagues or my friends. 11 Q Who requested the meeting? 12 A Myself. 13 Q Why did you want to talk to her about 14 the persecution of your colleagues on the 15 mainland? 16 A Chat. Just chat. 17 Q So during this chat, you also talked 18 to her about Eastern Profit? 19 A Correct. 20 Q But at that time, as you said 21 earlier, you did not know that this continuation 22 deposition would be ordered? 23 A What's your question? 24 Q But at that time, as you testified 25 earlier, you did not know that the continue</p>	<p>1 YVETTE WANG 2 3 Q What was her response? 4 A She was upset and she said she didn't 5 know anything about this. And she ask me to 6 handle everything. 7 Q Okay. How did you respond to her 8 request? 9 A I said -- I don't remember the clear 10 precise quote, but I told her okay. I have been 11 already dealing with this group of liars, and this 12 case, I will handle this for you. You don't need 13 to worry because you don't know anything about 14 this at all. 15 Q How did you know that she didn't know 16 anything about this at all? 17 A I don't understand your question. 18 Q How did you know that Guo Mei did not 19 know anything about this at all? 20 A Oh. That is my guess because I ask 21 her: Did you hear or heard about these two liars, 22 French Wallop and Michael Waller? She said I 23 don't know. 24 Q Was this after Strategic Vision had 25 filed its counterclaim in this case? A When did you file counterclaim?</p>
<p style="text-align: center;">Page 26</p> <p>1 YVETTE WANG 2 deposition would be ordered; did you? 3 MS. CLINE: Objection to form. 4 A Should I know by then what will 5 happen after like a couple of month? Fair; right? 6 Q Right. So the answer is no? 7 A Correct. 8 Q So why did you want to talk to her 9 about Eastern Profit during this restaurant 10 meeting? 11 A Because Eastern Profit signed a 12 Limited Power of Attorney authorize Golden Spring 13 to handle this case. 14 Q So were you reporting on the progress 15 of the case? 16 A What do you mean report? 17 Q Tell. Were you telling her about the 18 progress of the case? 19 A I told her. 20 Q Okay. And what did you tell her? 21 A I told her Eastern Profit was 22 cheated. And Eastern Profit right now is in a 23 lawsuit. I probably need to know more, know more 24 about Eastern Profit so I can help to deal with 25 this litigation.</p>	<p>1 YVETTE WANG 2 July 23rd. 3 A Which year? 4 Q 2019. 5 A Oh. I don't remember that. It's in 6 summer, but I don't remember which month. It's 7 before you or after you. I don't remember that. 8 Q What else did you discuss about 9 Eastern Profit? 10 A I ask like I remember the general, 11 like basic information about Eastern Profit. 12 Q What did she tell you? 13 A The bank. The first thing she told 14 me Eastern Profit bank accounts was frozen in Hong 15 Kong. 16 Q Okay. What else? 17 A Eastern Profit is a Hong Kong 18 company. 19 Q I think you knew that at your first 20 deposition. Do you remember that? 21 A I don't remember that. 22 Q What else did she tell you? 23 A Before the bank accounts like was 24 frozen, Eastern -- I don't remember that clearly. 25 Kind of she told me Eastern has</p>

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8 (Pages 26 to 29)

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<p>1 YVETTE WANG 2 office in Hong Kong. And Eastern Profit, they 3 have assets, yeah, because I was asking her about 4 the general, like basic information about this 5 company.</p> <p>6 Q Right. 7 A So she told me these things. 8 Q Do you remember anything else she 9 told you?</p> <p>10 MS. CLINE: I'm just going to 11 object to the line of inquiry. There 12 is a narrow set of topics on which we 13 agreed and the court issued an order 14 that don't include, for example, 15 whether or not Eastern Profit has any 16 independent financial identities. 17 I'm not sure why we're delving 18 into every piece of every 19 conversation she had with Guo Mei, 20 and I think we should move on and get 21 to the substance of the deposition as 22 agreed upon.</p> <p>23 MR. GREIM: It's the only 24 natural person we've heard about, so 25 we're finally getting some relevant</p>	<p>1 YVETTE WANG 2 Q So did she tell you during this 3 discussion that Hank, as you said, or Han Chung 4 Uang, was still running Eastern Profit at that 5 time? 6 A In my understanding, yes. 7 Q Did she tell you what he does for 8 Eastern Profit? 9 A Not too much, because she expressed 10 like as a normal business if the bank account was 11 frozen or is frozen, what kind of business you can 12 continue. 13 But she emphasized Mr. Han as still 14 helping her to like manage the cars and -- yeah, 15 the cars. Basically the assets of Eastern Profit. 16 Q Did you say cars as in automobiles? 17 A Yeah. Driving car. 18 Q Well, what else did she say about 19 Mr. Han? 20 A Still I remember back to our like CCP 21 persecution chat. Mr. Han has his family member 22 mainland of China also. So they are threatened 23 and even arrested, integrated by Chinese Communist 24 Party also. 25 * Q Did you tell Mei Guo that you're</p>
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<p>1 YVETTE WANG 2 testimony. But I think we exhausted 3 the witness on this.</p> <p>4 Q I do have a question. Did Guo Mei 5 mention to you Han Chung Uang? 6 A Yes. 7 Q What did she say? 8 A I don't remember the precise quotes 9 again. Kind of like she told me Mr. Han, she 10 trusted her -- trusted him, and he was running 11 Eastern before. 12 And Mei Guo, she has no problem or 13 issue with him, and having him still running 14 something on behalf of Eastern Profit.</p> <p>15 Q Did she say whether he actually still 16 was running something on Eastern Profit? 17 A Sorry. What's your question? 18 Q Did she say whether he actually still 19 was running something on behalf of Eastern Profit? 20 A You mean he; right? 21 Q Right. 22 A You're asking what time period? 23 Q I'm trying to understand what she 24 told you. 25 A Of course.</p>	<p>1 YVETTE WANG 2 member of the Chinese Communist Party? 3 MS. CLINE: Objection. This is 4 a deposition in her corporate 5 capacity. This is not about Miss 6 Wong personally, and we really need 7 to move on and get to the substance 8 as to our agreement and the court's 9 order. 10 MR. GREIM: Okay. That's the 11 last question, and we'll move on to 12 your other prep for this deposition. 13 MS. CLINE: No. I object to the 14 question as beyond the scope. 15 MR. GREIM: Well, the witness 16 opened the door by talking about this 17 persecution of Mr. Han. 18 MS. CLINE: No. No. No. I 19 object. We can call the court on 20 this one if you want to, and we can 21 make a list of everybody, and we're 22 going to call the court. 23 You're asking her about 24 questions in her personal capacity, 25 and that's not why she's here.</p>
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9 (Pages 30 to 33)

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1 YVETTE WANG
 2 MR. GREIM: We will just simply
 3 mark that and keep going.
 4 **Q Okay. You said you also talked to**
5 Mr. Han Chung Uang who you characterized as a
6 representative of Eastern Profit.
 7 When did you talk to Han Chung Uang
 8 in preparation for this case? Let me give you a
 9 different question.
 10 When did you talk with Mr. Han Chung
 11 Uang in preparation for this deposition?
 12 A Again, this deposition was ordered
 13 like two, three ago. How I can prepare something
 14 which by then was not expected to happen with a
 15 precise date?
 16 My answer is I didn't talk to Mr. Han
 17 right before this deposition was ordered.
 18 **Q Okay. Fair enough. I will ask you a**
 19 **question that covers a little bit more.**
 20 **I would like to know whether you have**
 21 **gained information from talking to Han Chung Uang**
 22 **that you will use to answer the questions today?**
 23 A Obtained?
 24 **Q Obtained.**
 25 A Yes, I did.

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1 YVETTE WANG
 2 A Should be after, yeah.
 3 **Q Why do you say that?**
 4 A Because was Mei Guo, as I said, in
 5 summer, yeah. With Mr. Han should be like end of
 6 the summer.
 7 **Q Where did you meet with Mr. Han?**
 8 A I met him in the lobby of my office.
 9 **Q This is the 162 East 64th Street?**
 10 A Yes.
 11 **Q How long was your conversation with**
 12 **him?**
 13 A Not very long. Like 20, 30 minutes.
 14 **Q So did you talk right there in the**
 15 **lobby of Golden Spring?**
 16 A The lobby? I don't mean like a
 17 public everyone goes in and out. Yeah. There is
 18 a conference room in the lobby.
 19 **Q What did you ask Mr. Han?**
 20 A He asked me.
 21 **Q He asked you questions?**
 22 A Yeah.
 23 **Q What did he ask you?**
 24 A He told me he was chased by the
 25 lender for the one minute.

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1 YVETTE WANG
 2 **Q So when -- when were the**
 3 **conversations that you had with Mr. Han Chung Uang**
 4 **about Eastern Profit since your last deposition?**
 5 A When? Since my last deposition. My
 6 last deposition is January of this year; right?
 7 Yeah, the conversation for sure
 8 happened in this year, yeah.
 9 **Q Okay. So we know you did not talk to**
 10 **him before your last deposition. So my question**
 11 **is that was January 31st, 2019. When have you**
 12 **talked to him since then to gain information about**
 13 **Eastern Profit?**
 14 A A couple of months ago.
 15 **Q A couple of months ago?**
 16 A Yes.
 17 **Q Was that the only time you talked to**
 18 **Mr. Chung Uang to gain information about Eastern**
 19 **Profit?**
 20 A You mean after my first deposition?
 21 **Q Correct.**
 22 A Correct.
 23 **Q Was the conversation with Mr. Chung**
 24 **Uang before or after your conversation with Mei**
 25 **Guo?**

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1 YVETTE WANG
 2 **Q For the what?**
 3 A One million.
 4 MS. CLINE: One million.
 5 A U.S. dollars.
 6 **Q I see.**
 7 A He told me he doesn't speak too much
 8 English, and he asked me to handle this.
 9 **Q What do you mean the lender of the**
 10 **\$1 million? What are you referring to?**
 11 A I don't remember precisely his quote.
 12 He said kind of like as per the loan agreement,
 13 Eastern should pay back the 1 million loan.
 14 And he was not sure, and he doesn't
 15 know about the litigation, so he ask me to
 16 continue, help and handle completely.
 17 **Q Did Mr. Chung Uang say that someone**
 18 **else told him that Eastern Profit should pay back**
 19 **the million dollars, or did he tell you that**
 20 **Eastern Profit should pay back the \$1 million?**
 21 A He told me Eastern Profit borrowed
 22 this 1 million, and now Eastern is unable to pay
 23 back that. He was chased.
 24 **Q Did he tell you who Eastern Profit**
 25 **borrowed the money from?**

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10 (Pages 34 to 37)

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<p>1 YVETTE WANG</p> <p>2 A ACA.</p> <p>3 Q ACA?</p> <p>4 A ACA.</p> <p>5 Q Did he tell you that someone, a 6 person actually chased him around New York City 7 for the money? I'm trying to understand what you 8 mean by chased? What do you mean by chased?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 Q What do you mean by chased?</p> <p>11 A What do you mean by chased? What do 12 you mean by chased, like a stalk.</p> <p>13 Q Did he explain to you what he meant 14 by chased? Is that the word he used?</p> <p>15 A He speaks Mandarin, Chinese.</p> <p>16 Q True. Okay. What did he tell you 17 about the efforts of ACA to recover the 18 \$1 million?</p> <p>19 A Oh, okay. He mentioned to me he was 20 like called. Called. Called by a phone call.</p> <p>21 Q Called?</p> <p>22 A Yeah. And, yeah, like called like a 23 couple of times he said.</p> <p>24 Q Did he say when he received the phone 25 calls?</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Same objection.</p> <p>3 A What is your question?</p> <p>4 Q Is dealing with ACA on behalf of 5 Eastern Profit regarding the \$1 million loan part 6 of GSNY's duties under the limited Power of 7 Attorney? I'm asking you for your understanding 8 as Eastern Profit.</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A I don't know what you mean dealing 11 with.</p> <p>12 Q Communicating with ACA.</p> <p>13 A When? From when to when?</p> <p>14 Q Today.</p> <p>15 A He didn't clearly say that in our 16 conversation, but my understanding should be yes.</p> <p>17 Q So Eastern Profit believes that it is 18 authorized to deal with -- I'm sorry. Eastern 19 Profit believes that Golden Spring is authorized 20 to deal directly with ACA on repayment of the 21 loan?</p> <p>22 MS. CLINE: Objection to the 23 form. We may be going beyond the 24 scope. It's not a memory test. If 25 you have a question about the POA,</p>
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11 (Pages 38 to 41)

30(b)(6) Yvette Wang
 October 30, 2019

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<p>1 YVETTE WANG 2 start with -- I'm going to break this apart. 3 Okay? 4 I'm going to ask you about the loan 5 that Eastern Profit claims it has with ACA. Okay? 6 My first question is is negotiation of that loan 7 between Eastern Profit and ACA one of the powers 8 that Eastern Profit granted Golden Spring under 9 this Power of Attorney? 10 MS. CLINE: You're asking her to 11 read the document? 12 Q I'm asking for Eastern Profit's 13 testimony. If you want to look at the document if 14 that would help, that's fine. If you think you 15 personally know it, that's fine too. 16 MS. CLINE: This deposition is 17 not about her personal knowledge. 18 A Can I read this? 19 Q Go ahead. 20 A (Reading) What's your question? 21 Q I'll have the court reporter just 22 read it back. 23 (The requested portion of the 24 record was read back by the 25 reporter.)</p>	<p>1 YVETTE WANG 2 Has Eastern Profit asked Golden 3 Spring New York to deal on Eastern Profit's behalf 4 with ACA regarding the loan? 5 A You asked about when? 6 Q As of now. 7 A In my conversation with Mr. Han, he 8 mentioned to me or he asked me can you please 9 explain what is happening to ACA about this loan, 10 because I was or I am chased to ask before pay 11 back. I don't know how to explain to ACA. 12 Q How did you respond him? 13 A I said okay. 14 Q Was this the first time Mr. Chunguang 15 had told you that ACA was trying to recover this 16 million dollar payment? 17 A I don't remember clearly, but yes. 18 Q Before your conversation with 19 Mr. Chunguang, had you heard from anyone, from any 20 other source, that ACA was trying to recover the 21 million dollar payment? 22 A What's your question? 23 Q Before this conversation with 24 Mr. Chunguang, had you heard from anyone, from any 25 other source that ACA was trying to recover the</p>
<p style="text-align: center;">Page 42</p>	<p style="text-align: center;">Page 44</p>

<p>1 YVETTE WANG 2 MS. CLINE: I'm going to repeat 3 my objection to form. You're asking 4 the witness to interpret a document 5 that speaks for itself and we can all 6 read. 7 A This limited Power of Attorney in my 8 understanding is talking about Eastern Profit's 9 Corporation Limited authorized Golden Spring New 10 York Limited to deal with the contract with 11 Strategic Vision. 12 Q There's no reference to ACA in here, 13 is there? 14 A I didn't see that name on these two 15 pages. 16 Q So let me ask you this. Separate and 17 apart from this Limited Power of Attorney, has 18 Eastern Profit asked Golden Spring New York to 19 deal with ACA regarding the purported Eastern 20 Profit ACA loan? 21 A What do you mean purported? 22 Q The loan. 23 A Okay. 24 Q Has Eastern Profit -- I'll repeat the 25 question.</p>	<p>1 YVETTE WANG 2 million dollar payment? 3 A Yes, I did. 4 Q From where? 5 A I remember ACA mentioned this to me 6 also. 7 Q When was that? 8 A Kind of like by the -- long time ago. 9 By the end of or fall of 2018. 10 Q Who is the person from ACA who 11 contacted you? 12 A William. 13 Q William who? 14 A William Yu. 15 Q How do you spell that in English? 16 A William? 17 Q No. Yu. 18 A Y-U. 19 Q Is William Yu also sometimes called 20 William Je, J-E? 21 A I don't know his other name. 22 Q Does he also go by Je Kin Ming, J-E 23 K-I-N M-I-N-G? 24 A I just know his name is William. 25 Q Did William reach out to you by phone</p>
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12 (Pages 42 to 45)

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<p>1 YVETTE WANG</p> <p>2 or E-mail?</p> <p>3 A In the fall of 2018, like last year, 4 a year ago, I believe I met him in the restaurant 5 again.</p> <p>6 Q And he mentioned it over lunch or 7 dinner?</p> <p>8 A Dinner?</p> <p>9 Q Yes, over dinner?</p> <p>10 A Yes, dinner.</p> <p>11 Q Who else was present, if anyone?</p> <p>12 A Just me and him.</p> <p>13 Q What did he say?</p> <p>14 A About what?</p> <p>15 Q About the million dollar loan.</p> <p>16 A I don't remember precisely what he 17 said. Kind of he asked, I heard you are cheated, 18 and then I briefly told her.</p> <p>19 Q Told him?</p> <p>20 A Yeah, told him. Yeah. We were 21 cheated by two liars.</p> <p>22 Q So did he demand repayment of the 23 million dollars from Eastern Profit?</p> <p>24 A You mean in our dinner?</p> <p>25 Q Yes.</p>	<p>1 YVETTE WANG</p> <p>2 Q Did you tell him at the dinner that 3 you met Eastern?</p> <p>4 A What's the question? 5 MS. CLINE: Objection to form.</p> <p>6 Q Did you tell him at the dinner that 7 when you said that you were cheated, you actually 8 meant Eastern?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A You mean I mean Eastern or I said 11 Eastern? What is the question?</p> <p>12 Q Did you tell Mr. Je or Mr. Yu that 13 Eastern was the one that was cheated?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I didn't pronounce Eastern is worse, 16 but I said I was cheated. We were cheated. Which 17 if you want to understand who they are, we or I, 18 in my understanding they are the Eastern people, 19 not including myself.</p> <p>20 Q Who else?</p> <p>21 A Who else? 22 MS. CLINE: Objection to form.</p> <p>23 A Oh, yeah. I forgot this one. Miles, 24 M-I-L-E-S.</p> <p>25 Q This is Guo Wengui?</p>
<p style="text-align: center;">Page 46</p>	<p style="text-align: center;">Page 48</p>

1 **YVETTE WANG**

2 A He mentioned that. Kind of a -- he
3 said we are expecting the result, but you are
4 cheated. And the loan agreement, the loan kind of
5 like need to be pay back.

6 **Q What result did he say he was
7 expecting?**

8 MS. CLINE: Objection to form.

9 A Generally they corrupted Chinese
10 official information.

11 **Q So William Je said he expected that
12 information?**

13 MS. CLINE: Objection to form.

14 A Correct.

15 **Q Did you tell him that, in fact, you
16 were cheated?**

17 MS. CLINE: Objection to form.

18 A Yes.

19 **Q And who is the "you" who was cheated?**

20 A Myself.

21 **Q "You," Yang Ping Wang? (Phonetic)**

22 A When I say I was cheated, I mean I
23 should say Eastern, because -- if you're asking
24 about contract. But I was authorized by Eastern.
25 So if I say I, I mean Eastern.

1 **YVETTE WANG**

2 A Correct.

3 **Q Okay. Who else?**

4 A Man Cho Han.

5 **Q Who else?**

6 A Who do you want else?

7 **Q Who were the people? You said the
8 Eastern people were cheated. I'm asking who are
9 those Eastern people that you are referring to?
10 You mentioned Guo, you mentioned
11 Lianchao.**

12 A You cannot define my term by
13 yourself, okay. I say Eastern people. I don't
14 mean Eastern's employee, or Eastern's director or
15 Eastern's like whatever.

16 I mean the people on Eastern's side
17 who are authorized, who is designated, and who has
18 the same goal to take down Chinese Communist
19 Party.

20 That is my definition about Eastern
21 people.

22 **Q Very good. We'll come back to that.
23 That's a separate section. So let me bring us
24 back to the outline here so I cover everything.
25 Before we leave this discussion with**

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13 (Pages 46 to 49)

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<p>1 YVETTE WANG</p> <p>2 William Yu, did you commit to him that Eastern</p> <p>3 Profit would pay him back the million dollars?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A What do you mean committed?</p> <p>6 Q Tell.</p> <p>7 A In my understanding, this is a low</p> <p>8 agreement between lender and a borrower. And the</p> <p>9 borrower should pay back the money, which means</p> <p>10 Eastern should pay back.</p> <p>11 Q My question is what you told him</p> <p>12 though. Not how you characterize this, but my</p> <p>13 question is: What did you tell Mr. Yu?</p> <p>14 A I prefer not to use told. I agreed.</p> <p>15 Q So you -- so Mr. Yu told you that he</p> <p>16 expected Eastern Profit to pay a million dollars</p> <p>17 to ACA. You told him that you agreed?</p> <p>18 A With interest.</p> <p>19 Q With interest?</p> <p>20 A Yeah.</p> <p>21 Q Did you have authority to tell Mr. Yu</p> <p>22 that on behalf of Eastern?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A Authority? What do you mean</p> <p>25 authority?</p>	<p>1 YVETTE WANG</p> <p>2 Mr. Yu, had Eastern Profit given you authority to</p> <p>3 deal with Mr. Yu about repayment of the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A When William mentioned to me I will</p> <p>6 have to ask the loan to be asked. I have to ask</p> <p>7 the loan to be fully paid back with interest. I</p> <p>8 said yes. I agree with you. I didn't say there</p> <p>9 is any reason. You couldn't.</p> <p>10 Q My question to you --</p> <p>11 A That was my conversation with William</p> <p>12 about this loan.</p> <p>13 Q Okay. My question now to you is</p> <p>14 Eastern Profit is -- were you acting as Eastern</p> <p>15 Profit's agent in having that discussion with</p> <p>16 William Yu about the loan?</p> <p>17 A You mean before my dinner with</p> <p>18 William?</p> <p>19 Q During your dinner with William, were</p> <p>20 you acting as Eastern Profits' agent in saying</p> <p>21 yes, I agree with you that the loan should be</p> <p>22 repaid, or you're just expressing your own</p> <p>23 personal opinion?</p> <p>24 A Oh. It's much easier to understand</p> <p>25 now. I would express my personal opinion and</p>
<p style="text-align: center;">Page 50</p>	<p style="text-align: center;">Page 52</p>

<p>1 YVETTE WANG</p> <p>2 Q Well, had Eastern given you authority</p> <p>3 to deal with ACA regarding the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A Deal with ACA about the loan? It's</p> <p>6 too general. I couldn't understand your question.</p> <p>7 Q Well, we just looked at the limited</p> <p>8 Power of Attorney. It's not in there; is it?</p> <p>9 MS. CLINE: Objection.</p> <p>10 A What is not there?</p> <p>11 Q Your authority to deal with ACA</p> <p>12 regarding its purported loan to Eastern Profit is</p> <p>13 not set forth in the Power of Attorney; is it? We</p> <p>14 just looked at it.</p> <p>15 MS. CLINE: Objection. You're</p> <p>16 mischaracterizing the document and</p> <p>17 her testimony, and I think you're</p> <p>18 trying to confuse the witness. She's</p> <p>19 here as a representative of Eastern</p> <p>20 Profit. Later you can ask her about</p> <p>21 the role of Golden Spring.</p> <p>22 Q I'm asking for Eastern Profit's</p> <p>23 understanding about what power you had to deal</p> <p>24 with ACA regarding the loan.</p> <p>25 So when you were speaking with</p>	<p>1 YVETTE WANG</p> <p>2 Eastern's also.</p> <p>3 Q So why are you able to say that you</p> <p>4 were expressing Eastern's opinion?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A You're asking my personal</p> <p>7 understanding; right?</p> <p>8 Q No. I'm asking why is -- Eastern is</p> <p>9 sitting here today telling me that when you told</p> <p>10 William Yu yes, I agree with you, that you were</p> <p>11 speaking on behalf of it. And I'm saying on what</p> <p>12 basis. How or why did Eastern give you authority</p> <p>13 to speak on its behalf with William Yu?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I still don't quite understand your</p> <p>16 question.</p> <p>17 Q Okay. We'll break it down. We'll</p> <p>18 break it down.</p> <p>19 Did someone from Eastern tell you</p> <p>20 that you should deal with William Yu regarding the</p> <p>21 purported ACA to Eastern Profit loan?</p> <p>22 A By that dinner, I don't remember</p> <p>23 clearly. I don't remember clearly. I was talking</p> <p>24 with William. Again, I was thinking that I have</p> <p>25 this case in my hands. And this is a -- sounds</p>
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14 (Pages 50 to 53)

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<p>1 YVETTE WANG 2 like in my understanding a no more business loan 3 agreement, and people should pay back. 4 Q Now do you recall on January 31, 2019 5 at your first deposition you testified that you 6 had not seen the loan agreement. 7 Do you recall that? 8 MS. CLINE: Objection. If you 9 want to ask her about her testimony, 10 you can show her the transcript. 11 Q I'm happy to show you the transcript. 12 Do you want to look at it? 13 Let me do this. Do you recall 14 offhand whether you had seen the loan agreement 15 yet when you gave your first deposition in this 16 case? 17 A You're asking when I was deposed for 18 the first time, by then did I ever see with my own 19 eyes the loan agreement or not? 20 Q Right. 21 A I heard -- 22 Q Right. 23 A -- the loan agreement. 24 Q So as of January, 2019, you had heard 25 there was a loan agreement. You had not yet seen</p>	<p>1 YVETTE WANG 2 A Oh. In my dinner -- 3 Q Yes. 4 A -- with William? 5 Q Yes. 6 A I told him Eastern should pay back. 7 Q Did Eastern have an understanding how 8 it was going to pay back the loan? 9 A By this lawsuit. That's why Eastern 10 sued, to get this 1 million back, because 11 Eastern's bank account was frozen. 12 Q It wasn't frozen yet at that time in 13 the fall of 2018? 14 MS. CLINE: Objection to form. 15 A Eastern's bank account was frozen 16 around June of 2018, yes. 17 Q Although that was after the lawsuit 18 was filed, wasn't it? The lawsuit was filed in 19 March of 2018; isn't that right? 20 MS. CLINE: Objection again. 21 This is a memory test. 22 A Oh, yeah. This is a memory test. My 23 mistake. 24 You're confusing me with all these 25 dates back and forward, Eddie.</p>
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15 (Pages 54 to 57)

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<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q I gather that somebody was not actually following him around the streets for collection. I gather that you mean somebody was contacting him; correct?</p> <p>7 A Correct.</p> <p>8 Q And who was the person who was contacting him?</p> <p>10 MS. CLINE: Objection.</p> <p>11 Q Who did he say?</p> <p>12 MS. CLINE: Objection to form.</p> <p>13 A You're asking the name; right?</p> <p>14 Q Yes. Yes.</p> <p>15 A William.</p> <p>16 Q Did he say whether William -- this is the same William Yu, or the same William Yu that you mentioned before?</p> <p>19 A Correct.</p> <p>20 Q Did he say how William Yu was contacting him?</p> <p>22 A What was the question?</p> <p>23 Q Did he say how William Yu was contacting him?</p> <p>25 A You mean by what kind of a</p>	<p>1 YVETTE WANG</p> <p>2 Q Yes I am, actually.</p> <p>3 A Wow. Year?</p> <p>4 Q Something he said gave you the impression that the calls had been happening for about a year?</p> <p>7 A Yes.</p> <p>8 Q But you can't remember the exact words he used?</p> <p>10 A If you want me to translate, because he speaks Mandarin, he used long time, always some words like that.</p> <p>13 Q Did he know William Je by the way; was William Je known to him?</p> <p>15 MS. CLINE: Objection.</p> <p>16 Foundation.</p> <p>17 This is beyond the scope of a</p> <p>18 30(b)(6) of Eastern Profit.</p> <p>19 Q It's important to understand whether the Eastern Profit purported representative dealing with ACA on repayment of the loan, whether they're known to each other or not.</p> <p>20 Did you get the understanding from talking to Mr. Han that he was already familiar with William Yu?</p>
Page 58	Page 60
<p>1 YVETTE WANG</p> <p>2 communication tool; right?</p> <p>3 Q Yes. Yes.</p> <p>4 A He said phone call.</p> <p>5 Q Did he say how many phone calls?</p> <p>6 A A couple of.</p> <p>7 Q And your testimony is he did not say when he had received these phone calls?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A You're asking did he tell me on which dates he was caught?</p> <p>12 Q Just generally when. If he gave you dates, great.</p> <p>14 A Which unfortunately he didn't give me the dates.</p> <p>16 Q Did he tell you it was recent?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Not only recent. Yeah. He said --</p> <p>19 he told me he was called or he was chased for long time.</p> <p>21 Q Just a few more questions, and then we will take a break here.</p> <p>23 What do you mean for a long time?</p> <p>24 A You're asking my personal understanding?</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Again, this is a corporate designee deposition of Eastern Profit. You subpoenaed everyone whose name has ever been mentioned in this case. You can ask more appropriate people those types of questions.</p> <p>9 MR. GREIM: Okay. I'll just ask Eastern Profit.</p> <p>11 Q Was William Yu familiar with -- I'm sorry. Was Mr. Han familiar with William Yu?</p> <p>13 MS. CLINE: Objection.</p> <p>14 Foundation.</p> <p>15 A I don't remember my filling, that conversation. Eddie is asking my personal filling.</p> <p>18 Q Well I'm not asking -- I'm asking -- forget about your feelings. Sorry. It sounds terrible.</p> <p>21 A I'm fine.</p> <p>22 Q I'm asking Eastern Profit whether the person it claims is its principal is familiar with William Yu.</p> <p>25 MS. CLINE: Objection.</p>
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16 (Pages 58 to 61)

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1 YVETTE WANG
 2 Foundation.
 3 You're going to depose Mr. Han.
 4 You can ask him a question directly.
 5 MR. GREIM: Okay. If this
 6 representative doesn't know that,
 7 that's okay.
**Q But if Eastern Profit knows the
 answer, I would like to know the answer.**
 8 A I cannot talk on behalf of any
 9 individual. His or her personal knows someone or
 10 don't know someone, familiar with someone or not
 11 familiar with someone.
 12 MR. GREIM: All right. Let's
 13 take a break. Let's take a 10-minute
 14 break, if that's okay.
 15 Does that make sense?
 16 THE VIDEOGRAPHER: The time is
 17 11:36 a.m., Wednesday, October 30,
 18 2019. This is the end of media
 19 number one of the videotaped
 20 deposition of Miss Yvette Wang.
 21 We are off the record.
 22 (At this time, a brief recess
 23 was taken.)

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1 YVETTE WANG
 2 **ACA regarding the million dollar loan?**
 3 MS. CLINE: Objection to form.
 4 A In my understanding from the moment I
 5 knew the loan, I should help Eastern to handle
 6 everything.
**Q From the first time you learned of
 the loan, you believed it was your responsibility
 to handle issues regarding the loan?**
 7 MS. CLINE: Objection to form.
 8 A Yes.
**Q And you first learned of the loan
 sometime in 2018; right?**
 9 A Yes.
**Q Possibly you learned of it for the
 first time in your dinner with William Yu?**
 10 MS. CLINE: Asked and answered.
 11 A I believe you asked this question
 12 already. The answer is possibly.
**Q So what has Eastern done, or what has
 Eastern told you to make you believe that you have
 authority on its behalf to deal with ACA regarding
 the loan?**
 13 MS. CLINE: Objection to form.
 14 She's already testified about her

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1 YVETTE WANG
 2 THE VIDEOGRAPHER: The time is
 3 11:51 a.m., Wednesday, October 30,
 4 2019. This is media number 2 of the
 5 videotaped deposition of this event.
 6 We're back on the record.
 7 CONTINUED EXAMINATION
 8 BY MR. GREIM:
**Q Okay. I want to clear up a few
 things from our last round of questions, and then
 we'll move on to a new topic. Okay?**
 9 A (Nodding)
**Q In your conversation with Guo Mei,
 did she ask you to handle Eastern Profit's
 interactions with ACA regarding the million dollar
 loan?**
 10 A You mean our dinner?
Q Yes.
 11 A She didn't specifically say the
 12 details, but basically she said, "I don't know any
 13 of this. Please handle all of this."
**Q So is it Eastern Profit's position
 that -- let me back up.**
**Is it Eastern Profit's position that
 you are to handle negotiations or discussions with**

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1 YVETTE WANG
 2 responsibilities.
 3 A I will repeat my answer again.
 4 Both Mr. Han and Miss Mei Guo told me
 5 can you please handle everything, because we do
 6 not know the details.
**Q But those two conversations happened
 in the summer and the late summer of 2019; right?**
 7 MS. CLINE: Objection to form.
 8 A Yes.
**Q So how did you get authority from
 Eastern Profit before that time to deal with ACA
 regarding the loan?**
 9 A What's your question?
**Q How did you get authority from
 Eastern Profit before your discussions with Guo
 Mei and Han Chenguang to deal with ACA regarding
 the loan?**
 10 A What I say before this conversation?
**Q For example your fall, 2018 dinner
 meeting with William Yu.**
 11 A In my understanding, that was a
 12 dinner. It's not specifically about anything.
**Q Well, you testified earlier that when
 you said yes, I agree, that you were speaking on**

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17 (Pages 62 to 65)

30(b)(6) Yvette Wang
 October 30, 2019

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<p>1 YVETTE WANG</p> <p>2 behalf of Eastern Profit as well as on behalf of</p> <p>3 yourself.</p> <p>4 So who from Eastern Profit gave you</p> <p>5 authority to deal with William Yu on that behalf</p> <p>6 in the fall of 2018?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A Eddie, can you please break your</p> <p>9 question, because I am not English native speaker.</p> <p>10 Q Okay. Fair enough. Let's get this</p> <p>11 right.</p> <p>12 Who gave you authority to say yes, I</p> <p>13 agree on behalf of Eastern Profit in the fall of</p> <p>14 2018?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 Assumes facts not in evidence.</p> <p>17 A I believe I am able to represent on a</p> <p>18 normal -- no. I believe I am able to talk on</p> <p>19 behalf of myself. Okay?</p> <p>20 That was William mentioned to me</p> <p>21 about this loan. If you were me, you will say</p> <p>22 "William, wait a second. Let me call someone to</p> <p>23 authorize me to talk to you about this loan."</p> <p>24 You shouldn't; right? You are in</p> <p>25 full capacity as a individual. I was talking by</p>	<p>1 YVETTE WANG</p> <p>2 loan. He said I need this to be paid back with</p> <p>3 interest. I said yes. You know, this is a loan.</p> <p>4 You guys have this common, no more business law</p> <p>5 agreement. The lender and the borrower, they need</p> <p>6 to do what they agree by the law agreement. This</p> <p>7 is precisely I said.</p> <p>8 Okay? I was asked. I cannot say --</p> <p>9 I cannot answer you this question.</p> <p>10 Q So you weren't speaking on behalf of</p> <p>11 Eastern Profit?</p> <p>12 MS. CLINE: Objection. Asked</p> <p>13 and answered. Mischaracterizes her</p> <p>14 testimony. Argumentative.</p> <p>15 Q I guess I'm going to keep going and</p> <p>16 tell you. There's two ways that you can get</p> <p>17 authority to act for Eastern Profit. Either there</p> <p>18 will be some sort of a writing, or somebody will</p> <p>19 tell you.</p> <p>20 I'm asking you which one of the two</p> <p>21 were you acting under when you spoke with Mr. Yu</p> <p>22 at this fall, 2018 meeting?</p> <p>23 MS. CLINE: I repeat all of my</p> <p>24 prior objections. With all due</p> <p>25 respect, your view of authority isn't</p>
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<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection. Eddie,</p> <p>3 you're taking that Power of Attorney,</p> <p>4 which has to do the authority granted</p> <p>5 to Golden Spring, and you're using it</p> <p>6 to misdirect the question to this</p> <p>7 witness who is sitting on behalf of</p> <p>8 Eastern Profit.</p> <p>9 So the Power of Attorney has to</p> <p>10 do with Golden Spring. You can ask</p> <p>11 about that later with respect to</p> <p>12 Golden Spring's authority.</p> <p>13 She's already answered your</p> <p>14 question about her role at Eastern</p> <p>15 Profit multiple times now.</p> <p>16 MR. GREIM: I'm asking for the</p> <p>17 basis of it, and I would ask for the</p> <p>18 speaking objections to stop.</p> <p>19 Q So here's my question. I'm going to</p> <p>20 ask it a third time. I haven't heard an answer</p> <p>21 yet.</p> <p>22 Is there any document that granted</p> <p>23 you authority to deal with William Yu on behalf of</p> <p>24 Eastern Profit relating to the ACA loan before</p> <p>25 your fall, 2018 dinner with William Yu?</p>	<p>1 YVETTE WANG</p> <p>2 words we said in that dinner to help you in here.</p> <p>3 Okay? William mentioned to me I heard you guys</p> <p>4 were cheated by liars, which means I will have to</p> <p>5 ask the loan to be paid back with interest. I</p> <p>6 remember I said yes, sadly, we were cheated, and</p> <p>7 I'm sorry about that.</p> <p>8 And I agree with you, since you guys</p> <p>9 have a law agreement, the borrower should pay you</p> <p>10 back, and we are in litigation right now trying to</p> <p>11 get that 1 million U.S. dollars from the liars</p> <p>12 back.</p> <p>13 Hopefully we can get the justice, and</p> <p>14 that 1 million U.S. dollars can be returned back</p> <p>15 to Eastern Profits with even any damage. So</p> <p>16 Eastern, as you said, you told me borrower can pay</p> <p>17 you back.</p> <p>18 Q Okay. My question --</p> <p>19 A That is precisely a hundred percent.</p> <p>20 No. Too much hundred percent. 99 percent of</p> <p>21 words we used in a conversation.</p> <p>22 Q That was not my question.</p> <p>23 My question is: Was there anyone</p> <p>24 from Eastern Profit who told you that you had</p> <p>25 authority to deal with William Yu on its behalf</p>
<p style="text-align: center;">Page 70</p> <p>1 YVETTE WANG</p> <p>2 A I don't remember that.</p> <p>3 Q Okay did someone from Eastern Profit</p> <p>4 tell you, before the fall, 2018 meeting, that you</p> <p>5 had authority to deal with William Yu on behalf of</p> <p>6 Eastern Profit relating to the ACU loan?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A What's the question?</p> <p>9 Q Did someone from Eastern Profit tell</p> <p>10 you before your 2018 dinner meeting with William</p> <p>11 Yu that you had authority to deal with him on</p> <p>12 Eastern Profit's behalf regarding the ACA loan?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A I don't remember that.</p> <p>15 Q So why do you believe that you did</p> <p>16 have authority to deal with Mr. Yu then?</p> <p>17 MS. CLINE: Asked and answered.</p> <p>18 A Did I believe? You're confusing me.</p> <p>19 Q On what basis does Eastern Profit</p> <p>20 claim that you had authority to deal with William</p> <p>21 Yu regarding the ACA loan at the fall, 2018</p> <p>22 meeting?</p> <p>23 A Eddie, I will repeat my reply for the</p> <p>24 fourth time for you.</p> <p>25 I tried to recall every inch of the</p>	<p style="text-align: center;">Page 72</p> <p>1 YVETTE WANG</p> <p>2 before you had that meeting? It's a yes or no.</p> <p>3 Someone did or someone didn't.</p> <p>4 MS. CLINE: Is not necessarily.</p> <p>5 Objection to form. Asked and</p> <p>6 answered.</p> <p>7 A I don't remember that.</p> <p>8 Q Now had the contract not terminated,</p> <p>9 how was Eastern Profit ever going to pay ACA back?</p> <p>10 A What's the question?</p> <p>11 Q If the contract had not been</p> <p>12 terminated and Strategic Vision had given Eastern</p> <p>13 Profit what it wanted, how was it ever going to</p> <p>14 repay the loan to ACA, or even make interest</p> <p>15 payments?</p> <p>16 A If they're not liars, we were not</p> <p>17 cheated, they're professional qualified</p> <p>18 investigation company. You're talking about if</p> <p>19 that is the scenario.</p> <p>20 Q How is Eastern Profit going to repay</p> <p>21 Strategic or ACA?</p> <p>22 A Which means if this contract with</p> <p>23 Strategic Vision, let's say, let's imagine work</p> <p>24 out, right, succeed by the end; right? Okay.</p> <p>25 Eastern Profit has bank account. And</p>

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<p>1 YVETTE WANG 2 I heard there are assets. The bank account was 3 frozen by Chinese Communist Party in Hong Kong. 4 By Eastern believes if the corrupted CCP are taken 5 down, they are -- there are assets. Nobody can 6 take them. 7 So the bank account will be unfrozen, 8 and Eastern will back to their normal business. 9 Q Which is what? 10 A I heard again -- this is my obtain 11 knowledge, like investment. 12 Q You said that at your first 13 deposition. What about investment management? 14 A What do you mean investment 15 management? 16 Q Well I'm just trying to ask you, what 17 do you mean investment? What is that? I don't 18 understand what you mean by that. 19 A It could be like the investment on 20 the cars, which they already have right now, in 21 any profitable investment. 22 What's your question? Sorry. 23 Q Are they a car dealership? 24 MS. CLINE: Objection to form. 25 Q You say investment in cars. They</p>	<p>1 YVETTE WANG 2 You're asking her the nature of 3 Eastern Profit's business. Fine. 4 But beyond that, getting into the 5 nature of investments and so forth I 6 think goes beyond the appropriate 7 scope. Again, I know the judge gave 8 you seven hours. But we can get to 9 the topics we agreed upon and are 10 covered by the court's order, that 11 would be the goal of this deposition. 12 Q What more do you know about Eastern 13 Profit's business? 14 A Eastern is registered in 2011. 15 Q Right. 16 A In Hong Kong. They are operating 17 from 2011 until they're their bank account was 18 frozen. 19 Q You said their business is 20 investments, which was your answer in the last 21 deposition, and also that they own cars. 22 Now is this part of their business? 23 Do they buy and sell cars, or do they just happen 24 to own a company car? 25 MS. CLINE: Again, objection.</p>
<p style="text-align: center;">Page 74</p> <p>1 YVETTE WANG 2 invest in antique cars? 3 A I didn't say that. 4 Q Okay. How does one invest in cars? 5 MS. CLINE: Objection. 6 Q I just want to understand. I don't 7 think we have to go far into this. I truly don't 8 understand the investment business in cars. What 9 do you know about this? 10 MS. CLINE: Objection to form 11 and mischaracterizes the testimony. 12 Q Tell me where I'm wrong. So far we 13 know that they own cars and that they do 14 investments. 15 What more can you tell me about the 16 business of Eastern Profit? 17 MS. CLINE: I'm going to lodge 18 another objection having now brought 19 up the opinion which says beyond the 20 scope of this testimony is whether 21 plaintiff has any independent 22 financial identity. 23 MR. GREIM: I'm not asking that. 24 I'm asking what it does. 25 MS. CLINE: Let me finish.</p>	<p style="text-align: center;">Page 75</p> <p>1 YVETTE WANG 2 Beyond the scope. 3 Q In other words, is this just as an 4 asset that they happened to have, in which case I 5 don't care about it whatsoever, or is it their 6 business to own cars, to invest, buy and sell 7 cars? 8 A I believe their investment is not 9 only buy and sell cars. 10 Q Okay. Is that one of the 11 investments? Do they make investments in cars? 12 A Sorry. What's the question? 13 Q Do they make investments in cars? 14 MS. CLINE: Objection to form. 15 A They own cars. It could come from 16 investment. 17 Q Let me ask it this way. 18 Do they own a fleet of cars, or do 19 they have a few company cars? 20 MS. CLINE: Objection to form. 21 A There's no difference in my 22 understanding. 23 Q Do they have one or two cars, or do 24 they have many cars that they have bought as an 25 investment?</p>

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<p>1 YVETTE WANG</p> <p>2 A I didn't ask that details.</p> <p>3 Q So at your last deposition, the only <p>4 person that you would talk to about Eastern <p>5 Profit, about its business, was Guo Wengui.</p> <p>6 Since your first deposition, have you <p>7 gone back to Guo Wengui to learn more about what <p>8 Eastern profit does?</p> <p>9 A You're asking from the -- my first <p>10 deposition until now?</p> <p>11 Q Correct.</p> <p>12 A I don't remember that. Probably no.</p> <p>13 Q When you spoke with Guo Mei, Guo's <p>14 daughter, did you ask her what Eastern Profit <p>15 does?</p> <p>16 A Yes, I did.</p> <p>17 Q What did she say?</p> <p>18 A Investment.</p> <p>19 Q The same thing her dad told you <p>20 before; right?</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 A I don't remember the dad told me <p>23 what. If you want me to read something, I can. I <p>24 don't remember.</p> <p>25 Q Does it do investments on behalf of</p> </p></p></p></p></p></p></p></p></p></p>	<p>1 YVETTE WANG</p> <p>2 That would be the similar question if</p> <p>3 I ask you, Eddie, are you comfortable to work with</p> <p>4 a client who has a reputation always failed to pay</p> <p>5 legal fee, and now suddenly you already know that</p> <p>6 before you who were not paid, you're still comfort</p> <p>7 to believe work for this client.</p> <p>8 That would be the same answer I will</p> <p>9 give you.</p> <p>10 Q Fair enough.</p> <p>11 Did someone at Eastern Profit tell <p>12 you that they wanted you to be the corporate <p>13 representative for purposes of this deposition?</p> <p>14 MS. CLINE: I'm going to object</p> <p>15 to the extent the decision as to who</p> <p>16 would be the rep was probably one</p> <p>17 that was conducted with counsel.</p> <p>18 So they said that the answer to</p> <p>19 that question calls for -- in any</p> <p>20 conversations you had with an</p> <p>21 attorney, you are instructed not to</p> <p>22 answer it.</p> <p>23 Q We're on the same page on that. I <p>24 don't want to hear what any attorney told you.</p> <p>25 I want to know whether an actual</p> </p></p></p>
<p style="text-align: center;">Page 78</p> <p>1 YVETTE WANG</p> <p>2 clients? Let me ask that question.</p> <p>3 Does it have compliance whose money <p>4 it manages?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A As a normal professional investment <p>7 business, I believe or I guess, yes.</p> <p>8 Q Do you know that, or is that just <p>9 your guess?</p> <p>10 A My guess.</p> <p>11 Q Are you comfortable speaking as the <p>12 representative of an entity for which you don't <p>13 know what its normal business is?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 Mischaracterizes her testimony.</p> <p>16 She's answered your question.</p> <p>17 Again, the Judge said that your <p>18 inquiry or your quick-sided quest to</p> <p>19 go figure out whether or not this</p> <p>20 company is, in quote, a shelf company</p> <p>21 in your words, is out of bounds, as</p> <p>22 is the subject of whether it has</p> <p>23 independent financial identity.</p> <p>24 A What's the question? Oh, yeah, I <p>25 remember now.</p> </p></p></p></p></p></p></p>	<p style="text-align: center;">Page 80</p> <p>1 YVETTE WANG</p> <p>2 living, breathing person with Eastern Profit told <p>3 you that they wanted you to be the 30(b)(6) <p>4 corporate rep?</p> <p>5 MS. CLINE: I object to the form</p> <p>6 of that question and repeat my</p> <p>7 instruction to you.</p> <p>8 So if you can answer it without</p> <p>9 talking about a conversation with the</p> <p>10 attorneys, then you may answer. But</p> <p>11 if it involves a conversation with</p> <p>12 attorneys, you should explain that.</p> <p>13 A You made me forget my question again.</p> <p>14 What's the question?</p> <p>15 Q Did any non-lawyer representative of <p>16 Eastern Profit tell you that they wanted you to be <p>17 the corporate representative for purposes of this <p>18 deposition?</p> <p>19 A For this deposition; right?</p> <p>20 Q Right.</p> <p>21 A Yeah, my lawyer told me.</p> <p>22 Q No. Stop. I don't want to know what <p>23 your lawyer told you.</p> <p>24 I want to know if a nonlawyer, who <p>25 was a representative of Eastern Profit, it could</p> </p></p></p></p></p></p></p>

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<p>1 YVETTE WANG 2 be Guo Mei, it could be Han Chunguang, could be 3 somebody else we don't know about yet, told you 4 that they want you to be the corporate 5 representative for this 30(b)(6)? 6 MS. CLINE: Independent of any 7 conversation with counsel in which 8 counsel was included. 9 Q Well, I don't want to know what 10 counsel said. Just because counsel was there 11 doesn't mean it's privileged. 12 I want to know what natural person 13 with Eastern Profit has told you that you're going 14 to be the 30(b)(6) representative. 15 MS. CLINE: I object to the form 16 of the question, as well as I'm going 17 to say if the decision as who would 18 be the 30(b)(6) witness was involving 19 counsel, I don't want you to answer 20 the question. 21 A I was told by both the director and 22 the representative of Eastern saying that they 23 want me to deal with all of this. 24 Q Okay. We talked about two 25 discussions, one with Mei Guo, with Mr. Han</p>	<p>1 YVETTE WANG 2 A I don't remember I did that. 3 Q You helped prepare Mr. Han for his 4 deposition; didn't you? 5 MS. CLINE: Objection to form. 6 A I don't remember I did that. 7 Q Is it your testimony that you did not 8 meet with Mr. Han -- let me be very clear. 9 Is it your testimony that you did not 10 confer with Mr. Han in advance of his deposition 11 about his testimony? 12 A What do you mean confer? 13 Q Talk. 14 A I don't remember I did. 15 Q So your testimony is that before 16 Mr. Han's deposition, you did not talk with him 17 about his deposition? 18 A I don't remember that. 19 Q I mean Lianchao Han, just to be 20 clear. 21 A I know who you're talking about. 22 Q Okay. And you talked to Mr. Han 23 during breaks in the deposition; didn't you? 24 A Yes, I did. 25 Q You talked with him about the case;</p>
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<p>1 YVETTE WANG 2 Chunguang, did you speak with any other person to 3 gain information about Eastern Profit since your 4 last deposition? 5 A Any other person; right? 6 Q Mm-hmm. 7 A My lawyers. 8 Q Other than your lawyers. 9 A I don't remember I did. 10 Q How about Lianchao Han? 11 A About what? 12 Q About this case. 13 A You asked me about Eastern Profits, 14 and then you asked me about this case. You have 15 two question. 16 Q How about this. Let's do this. Have 17 you talked to Lianchao Han about this case since 18 your last deposition? 19 A I don't remember that. Oh, except 20 his deposition. You remember? That was probably 21 the only time I met him since my first deposition. 22 Q And you talked to him before his 23 deposition; didn't you? 24 A About what? 25 Q About the case.</p>	<p>1 YVETTE WANG 2 didn't you? 3 MS. CLINE: Objection to form. 4 A I don't remember I did that. 5 Q You talked to him about his 6 testimony; didn't you? 7 MS. CLINE: Objection to form. 8 A I don't remember I did that. 9 Q Are you saying you don't remember or 10 that you didn't do it? 11 MS. CLINE: Objection to form. 12 Beyond the scope of this 30(b)(6) 13 deposition. 14 Is there a question pending? 15 MR. GREIM: There is. 16 A What's the question? 17 Q Is it that you don't remember, or you 18 didn't do it? 19 MS. CLINE: Same objection. 20 A I don't remember and I didn't do 21 that. 22 Q What about Mr. Guo, did you talk with 23 Mr. Guo between your last deposition and today 24 about this case? 25 A I don't remember.</p>
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<p>1 YVETTE WANG 2 Q Did you ask him any questions about 3 Eastern Profit? 4 A I don't remember that. 5 Q Did you ask him any questions about 6 the allegations and defenses in this case? 7 MS. CLINE: Objection to form. 8 A I don't remember that. 9 Q Again, you've been saying I don't 10 remember. I'm going to be clear. 11 Are you saying you might have, but 12 you can't remember, or are you saying you did not 13 do it? 14 A I just don't remember whether I did 15 that or not. 16 Q What about Karen Maistrello, did you 17 talk with her in preparation? 18 MR. GREIM: I would ask that the 19 side commentary from the corporate 20 representative needs to stop. This 21 is disrupting the deposition. I 22 would ask the side commentary from 23 Mr. Podhaskie to stop. 24 MR. PODHASKIE: Can you tell me 25 what topic of your --</p>	<p>1 YVETTE WANG 2 Q I'm trying to determine -- it sounds 3 like you've talked to exactly two people since 4 your last deposition on these topics, Mei Guo and 5 Mr. Han Chunguang. 6 And it was not -- for purposes of 7 preparation, it was just about the case, and 8 you're drawing on some of the information. 9 So I'm trying to find out whether any 10 of the other people -- whether you've spoken with 11 any of the other people, many of whom who have 12 been witnesses whose depositions you sat and 13 attended. 14 So I'm asking: Did you talk with 15 Miss Maistrello, let's limit it, about any of the 16 topics that you are to testify about today? 17 A You talked too much. What is the 18 question? 19 Q Since your deposition in January, 20 have you talked with Miss Maistrello about any of 21 the topics about which you are here to testify 22 today? 23 A No, I didn't. 24 Q Since your last deposition, have you 25 talked to William Yu about any of the topics about</p>
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<p>1 YVETTE WANG 2 talked about one discussion with him. 3 I'm going to see if there's been 4 any follow up since her last 5 deposition. 6 MS. CLINE: Again, I object to 7 the form of the question. Mr. G is 8 with ACA. You're asking her about 9 her testimony and her capacity as a 10 30(b)(6) for Eastern Profit. 11 The scope of whatever went on at 12 ACA and who was in charge of it and 13 its directors is specifically beyond 14 the scope of this deposition.</p> <p>Q Are you here to testify today about any information that you've gained from William Je about the ACA loan?</p> <p>MS. CLINE: Objection to the form.</p> <p>A I'm here to testify today for the order which you guys obtained October 28th, and in my understanding, that should be the topic on that list.</p> <p>Q Have you talked to William Je about any of those topics since your deposition?</p>	<p>1 YVETTE WANG 2 and I don't understand. I keep that topic in my 3 mind. I refer the topics on October 28th, 2019 4 order. And you went back to ask me about my first 5 deposition, which is 10 month from now. 6 My answer to you is I don't remember. 7 Too long time.</p> <p>Q Okay. Have you talked to William Je about the ACA loan since January, 2019?</p> <p>A He mentioned that to me.</p> <p>Q Okay. When was that?</p> <p>A This year.</p> <p>Q Okay. When this year?</p> <p>A I don't remember clearly.</p> <p>Q Was that after your first deposition?</p> <p>A Yes.</p> <p>Q Was it in the summer?</p> <p>A I don't remember that. It should be early summer or spring. Something.</p> <p>Q So is it before your discussion with Guo Mei?</p> <p>A I believe, yes.</p> <p>Q What did he tell you?</p> <p>A He asked what is going on with the lawsuit. When we can or we can get money back.</p>
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<p>1 YVETTE WANG 2 A What topics? 3 Q The topics you just mentioned, you said you understand you're here on an order on certain topics. 4 Have you talked to William Je about any of those topics since January, 2019? 5 A Eddie, you are confusing me again. 6 We have a two list of topics; right, my first deposition and the second one. 7 Which one are you referring to? 8 Q My question was clear. I'm going to repeat it. 9 You just told us you understand that you're here on certain topics pursuant to the court order. 10 A Which one? 11 Q Now keep those topics in mind, the ones you just mentioned to me. Keep them in mind. 12 Now I'm going to ask you whether you spoke with William Je about any of those topics after your first deposition? 13 MS. CLINE: Objection to the form. 14 A Okay. Don't feel I'm a foreigner,</p>	<p>1 YVETTE WANG 2 And it has been like closed one year. The loan 3 should be paid back. 4 So they are pushing. They have to 5 get the money back, otherwise the interest will be 6 huge. 7 Q Did he tell you what the interest was? 8 A Two percent per month. 9 Q But did William Je tell you what the interest was? 10 A Yeah. He mentioned that to me also. 11 Q When did you finally see a copy of the loan agreement? 12 A I don't remember that. 13 Q Well, ultimately it was given to us in this case. You didn't have it at your deposition. 14 And so my question is: Who showed it to you for the first time? 15 A Lawyer. 16 Q Who? 17 A Zach, I believe. 18 Q That's your prior counsel? 19 A Yes.</p>
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<p>1 YVETTE WANG 2 Q Have you discussed the loan document 3 with any other representative of Eastern Profit? 4 A I don't remember that. 5 Q Have you asked them whether it is 6 genuine? 7 MS. CLINE: Objection. 8 A Whether it is what? 9 Q Whether it is genuine. 10 MS. CLINE: Objection. 11 A What do you mean genuine? 12 Q Whether it is what it purports to be. 13 A I still don't understand your 14 question. Purport to be, you mean what? 15 Q Is it a real loan document signed by 16 ACA and Eastern Profit? 17 MS. CLINE: Objection to form. 18 A Okay. Back to your question. You 19 answer my question. 20 What is your question of this? 21 Q Have you asked anyone at Eastern 22 Profit whether it is genuine? 23 MS. CLINE: Objection to form. 24 A Why should I ask? I don't remember 25 asking. This is a normal, normal business law</p>	<p>1 YVETTE WANG 2 he actually signed it? 3 MS. CLINE: Objection to form. 4 A He told me. 5 Q Okay. 6 A Mm-hmm. 7 Q When did he tell you this? 8 A In our conversation. 9 Q Which conversation? 10 A The conversation in the lobby. 11 Q This is the conversation at the end 12 of the summer? 13 A Yes. 14 Q Did you have a copy of the loan 15 agreement in front of you at the time? 16 A You mean when I was talking with him; 17 right? 18 Q Yes. 19 A Nope. 20 Q Have you asked whether anyone 21 witnessed his signature? 22 A What's the question? 23 Q Have you asked -- let me be clear. 24 Have you asked Mr. Han whether anyone 25 else was present when he signed it?</p>
<p style="text-align: center;">Page 94</p> <p>1 YVETTE WANG 2 agreement. 3 Q How do you know? 4 MS. CLINE: Objection to form. 5 A As a law agreement you have lender, 6 you have borrower, you have term, you have 7 interest and drafted, I believe, by lawyers, I 8 believe. So this is what I believe. 9 Q Why do you believe it was drafted by 10 lawyers? 11 A This is my guess. 12 MS. CLINE: Don't guess. 13 THE WITNESS: Okay. 14 A Very simple. Mr. Han doesn't speak 15 English and write English at all. 16 Q Do you know whether Mr. Han actually 17 signed it? 18 A Yes. 19 Q How? 20 MS. CLINE: Objection to form. 21 A You mean by pen? 22 Q How do you know Mr. Han signed it? 23 A Oh. Because I saw the law agreement. 24 There was signature on there. 25 Q Have you ever asked Mr. Han whether</p>	<p style="text-align: center;">Page 95</p> <p>1 YVETTE WANG 2 A I didn't ask that. 3 Q Have you asked Mr. Je or Yu whether 4 anyone else was present when he signed it? 5 A I did not ask that. 6 Q How do you know Mr. Yu signed it? 7 Let me step. Do you know Mr. Yu 8 signed it? 9 MS. CLINE: Objection to form. 10 Object to the whole line of 11 questioning. 12 A So from the paper which Zack showed 13 me. Z-A-C-K. 14 MS. CLINE: I want to make sure 15 you don't talk about anything that 16 Zack told you, so be careful. 17 THE WITNESS: Okay. 18 A The law agreement was signed by both 19 lender and borrower. 20 (Wang Exhibit 31, a Loan 21 Agreement Bates stamped 22 Eastern-000278 to 280 previously 23 marked for Identification as of this 24 date.) 25 Q I'm going to hand you what we're</p>

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<p>1 YVETTE WANG</p> <p>2 marking Wang 31. I have a blank one for you to</p> <p>3 hand to your counsel next door.</p> <p>4 MS. CLINE: So the Notice of</p> <p>5 Deposition that you marked first,</p> <p>6 which was the exhibit number.</p> <p>7 MR. GREIM: 30. We started in</p> <p>8 the 30s for some reason. I'm not</p> <p>9 sure why.</p> <p>10 Q So let me ask you first. Have you</p> <p>11 seen this document before?</p> <p>12 A Yes.</p> <p>13 Q Is this the document Mr. Grendi</p> <p>14 (phonetic) showed you?</p> <p>15 A Yes.</p> <p>16 Q When he showed it to you, was it the</p> <p>17 first time you had seen it?</p> <p>18 MS. CLINE: Objection. Asked</p> <p>19 and answered.</p> <p>20 A The hard copy, yes.</p> <p>21 Q Well, had you seen it in some</p> <p>22 electronic version beforehand?</p> <p>23 A No.</p> <p>24 Q You qualified your answer was in hard</p> <p>25 copy. I'm just asking did you see it in some</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Again, the same</p> <p>3 caution. I don't want you to testify</p> <p>4 about any conversations you had with</p> <p>5 Zack.</p> <p>6 Mr. Greim is trying to figure</p> <p>7 out if the first time you saw it is</p> <p>8 when Zack gave it to you or if there</p> <p>9 was another time.</p> <p>10 Q When you say from Zack's file, what</p> <p>11 do you mean Zack's file?</p> <p>12 A I don't remember that. Zack's file,</p> <p>13 I mean Zack showed me or not. What he tell me, I</p> <p>14 cannot remember that.</p> <p>15 Q I'm not asking you for right now what</p> <p>16 he told you. I'm asking when you say from Zack's</p> <p>17 file, what file are you referring to?</p> <p>18 A This agreement.</p> <p>19 Q Did he give it to you in person?</p> <p>20 A I don't remember that.</p> <p>21 Q Did he E-mail it to you?</p> <p>22 A I don't remember that.</p> <p>23 Q Was it part of a larger set of</p> <p>24 documents?</p> <p>25 MS. CLINE: That's a yes or no</p>
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<p>1 YVETTE WANG 2 agreement. If the documents were 3 something other than versions of the 4 loan agreement, I don't want you to 5 answer the question. 6 A I never saw any draft of this 7 agreement. When I saw it, it's a completed 8 agreement already finished. 9 Q You testified at your first 10 deposition that you first heard of ACA after a 11 liar went from ACA to Strategic Vision. Do you 12 recall that? 13 A I don't remember that. 14 Q Let's take me a second. I will point 15 you to that, because I want to be very clear about 16 this. 17 Here we go. I'm going to slide over 18 to you a final copy of your deposition from 19 January 31, 2019. 20 A Yes. 21 Q I don't have a whole bunch of print 22 offs of these, but I assume that everybody -- let 23 me ask you. 24 Did you review your old testimony in 25 preparation for today?</p>	<p>1 YVETTE WANG 2 read it. 3 MR. GREIM: But I don't want to 4 loose my spot. 5 Q Did I read the first few lines 6 correctly? 7 A Yes. 8 Q Let's take a pause. Read through 9 whatever you need to read there on that page to 10 see what else to get context. 11 A You want me to read until which page? 12 Q There's a long discussion about why 13 the money was wired, which is not what my question 14 is about. 15 I'm asking you about the answer you 16 gave on lines 20 through -- question and answer on 17 lines 20 through 23. 18 Have you had a chance to get to 19 line 20 to 23 yet on page 40? 20 A Yes, I'm here. 21 Q So the attorney asked you prior to 22 them wiring a million dollars to Strategic Vision, 23 you had never heard of ACA Capital. Answer: No, 24 I didn't. 25 Did I read that right?</p>
<p style="text-align: center;">Page 102</p> <p>1 YVETTE WANG 2 A I didn't. 3 Q Look at page 40, please. Are you 4 there yet? 5 A Page 40, right? 6 Q Mm-hmm. 7 A Yes, I'm here. 8 Q So look at line 6. You see there's a 9 que there. That's the question of the other 10 lawyer, it wasn't me, who was asking you 11 questions. 12 You see it says: The entity ACA 13 Capital Group Limited, are you with that? 14 Answer: I heard this name. 15 Question: How did you hear this 16 name? 17 Answer, from this project. 18 MS. CLINE: Let me just 19 interrupt. The witness needs a 20 minute to read some more of the 21 transcript for context. 22 You should feel free. 23 MR. GREIM: Let's do that. 24 Q So far did I read it correctly? 25 MS. CLINE: Give her a minute to</p>	<p style="text-align: center;">Page 104</p> <p>1 YVETTE WANG 2 A Correct. 3 Q So you recall now testifying at your 4 first deposition that you had not heard of ACA 5 before the wire went to Strategic Vision? 6 A You're repeating what we said here; 7 right? 8 Q Correct. Do you recall testifying to 9 that at your first deposition? 10 A Yes. 11 Q Is that true? I mean is it true that 12 you had not learned -- you have not heard of ACA 13 capital until the money was wired to Strategic 14 Vision? 15 A Correct. 16 Q That's all I wanted to ask you. 17 So now I'm going to come back to this 18 agreement. When is the first time that you sought 19 any kind of writing, not necessarily Exhibit 31, 20 but any kind of writing that contained the terms 21 of the loan agreement? 22 MS. CLINE: Asked and answered. 23 A You mean any draft without any 24 signature? 25 Q Sure.</p>

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<p>1 YVETTE WANG 2 A No, I didn't. 3 Q Okay. What about an E-mail or any 4 other writing where the terms of the loan were 5 discussed, did you see anything like that before 6 Mr. Grendi showed you this loan agreement, 7 Exhibit 31? 8 A You mean did I see any terms in 9 E-mail? 10 Q Or in any other kind of writing. 11 A No, I didn't. 12 Q Do you know where Mr. Grendi got the 13 loan agreement? 14 MS. CLINE: That's a yes or no 15 question. I just want to be careful 16 about it. 17 Q We'll try carefully. 18 Do you know where Mr. Grendi got the 19 loan agreement before he gave it to you? 20 A I don't know. 21 Q Have you ever asked anyone at Eastern 22 Profit who was keeping this copy, who was keeping 23 a copy of the loan agreement? 24 MS. CLINE: Objection to form. 25 A I don't remember that.</p>	<p>1 YVETTE WANG 2 communications about the loan agreement in it? 3 A You're asking the possibility; right? 4 Q Of Eastern Profit about its own 5 files, yes. 6 A Possible. 7 Q Who searched for this; do you know? 8 Who searched for the loan agreement? 9 MS. CLINE: Objection to form. 10 A I didn't ask. 11 Q Did you? 12 A I don't remember that. 13 Q Did you ask somebody else to search 14 for the loan agreement? 15 A I don't remember that. 16 Q Han Chunguang, does he keep a copy of 17 the loan agreement? 18 A I didn't ask. He should. 19 Q Why do you say he should? 20 A Because he told me there's a loan 21 agreement. 22 Q Did he tell you he had his own copy? 23 A I don't remember. 24 Q Did he tell you when he signed it? 25 A By December, 2017. Yeah, by</p>
<p style="text-align: center;">Page 106</p> <p>1 YVETTE WANG 2 Q You mean so you may have asked 3 somebody, or you don't remember whether you did or 4 did not? 5 A I don't remember I asked or I didn't. 6 Q Who at Eastern Profit keeps records 7 of things like loan agreements? 8 A What's the question? 9 Q Who at Eastern Profit keeps records 10 of things like loan agreements? 11 A Usually the company registration 12 documents. Like Hong Kong company, they are 13 managed by secretary. 14 Q So did Eastern Profit's secretary 15 keep a copy of this loan agreement? 16 A I didn't say that. 17 Q You're just saying what you think is 18 normally true? 19 A I didn't ask and I don't know. 20 Q Does Eastern Profit have anyone who 21 keeps records of the loan agreement or 22 correspondence with ACA about the loan agreement? 23 A I didn't ask. 24 Q Is it possible that Eastern Profit 25 does have a file with the loan agreement and</p>	<p style="text-align: center;">Page 108</p> <p>1 YVETTE WANG 2 December, 2017. 3 Q But did he tell you? Let's look at 4 page 1. Page 1 says -- 5 A That's right. December, 2017. 6 Q It says it's made on the 29th of 7 December of 2017; right? 8 A Yes. 9 Q My question to you is not what the 10 loan agreement says. My question is: Did you ask 11 Mr. Han, or did he tell you the day on which he 12 affixed his signature to this document? 13 A He told me he signed a loan agreement 14 in December, 2017 for this Strategic Revision 15 investigation project. 16 Q When did he tell you that? 17 A In the conversation. 18 Q This is in the conference room at the 19 end of the summer? 20 A The lobby conference room. 21 Q Okay. A couple of months ago he told 22 you this? 23 A Yes. 24 Q Did you talk to William Je about 25 whether he signed the agreement?</p>

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<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection. Again,</p> <p>3 she's sitting here in her capacity as</p> <p>4 a representative of 30(b)(6) -- a</p> <p>5 30(b)(6) representative for Eastern</p> <p>6 Profit.</p> <p>7 You have yet to ask a single</p> <p>8 question about the contract that is</p> <p>9 the subject of this lawsuit.</p> <p>10 Now you're again asking</p> <p>11 questions about Mr. Je and ACA, which</p> <p>12 is specifically not within the scope</p> <p>13 of this deposition.</p> <p>14 So if we can just get to what</p> <p>15 we're actually litigating, that would</p> <p>16 be amazing.</p> <p>17 Q Did you ask Mr. Je about whether he</p> <p>18 signed this purported loan agreement from ACA to</p> <p>19 Eastern Profit?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A He told me he signed.</p> <p>22 Q When did he tell you that?</p> <p>23 A I don't remember that.</p> <p>24 Q Was it in 2019?</p> <p>25 A I believe it was in 2018. The</p>	<p>1 YVETTE WANG</p> <p>2 understand he's talking about ACA.</p> <p>3 Q But you didn't see this loan</p> <p>4 agreement until sometime in 2019 when Mr. Grendi</p> <p>5 gave it to you; correct?</p> <p>6 A I don't remember the time. Again, I</p> <p>7 told you I don't remember first time agreement.</p> <p>8 Q You testified at your deposition that</p> <p>9 you had asked for a copy of the loan agreement and</p> <p>10 hadn't gotten one.</p> <p>11 Do you remember that?</p> <p>12 MS. CLINE: Objection to form.</p> <p>13 Again if you want to show her</p> <p>14 testimony.</p> <p>15 MR. GREIM: We will.</p> <p>16 Q Turn to page 45, please. Are you</p> <p>17 there?</p> <p>18 A 45, yes.</p> <p>19 Q You see line 8 there is a question</p> <p>20 from the lawyer. He says: Is there documentation</p> <p>21 to support this loan? Answer: I requested there</p> <p>22 should be some documents. Question: Have you</p> <p>23 ever seen the documents supporting this loan</p> <p>24 answer? Answer: I didn't see that. Question:</p> <p>25 You did not see it? Answer: No.</p>
<p style="text-align: center;">Page 110</p> <p>1 YVETTE WANG</p> <p>2 dinner, that should be the first time he clearly</p> <p>3 told me, yes.</p> <p>4 Q So how did this come up that he</p> <p>5 signed it? Did you ask him or did he just</p> <p>6 volunteer that information?</p> <p>7 A He told me.</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A He told me we sign a loan agreement.</p> <p>10 We had a loan agreement.</p> <p>11 Q So he told you two things. One, that</p> <p>12 there was a loan agreement, and two, that he had</p> <p>13 been the signer on behalf of the ACA?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A You remember my first deposition in</p> <p>16 January, 2019, I said I even didn't hear about ACA</p> <p>17 company. My dinner with William was by light</p> <p>18 2018, that dinner. William just told me they sign</p> <p>19 a loan agreement. He didn't even mention to me</p> <p>20 what company.</p> <p>21 Q What company he signed on behalf of?</p> <p>22 A Yes.</p> <p>23 Q Did you understand that it was ACA,</p> <p>24 or did you think it was maybe a different company?</p> <p>25 A When I saw this loan agreement and</p>	<p style="text-align: center;">Page 112</p> <p>1 YVETTE WANG</p> <p>2 Did I read that correctly?</p> <p>3 A Yes.</p> <p>4 Q Now do you recall testifying at your</p> <p>5 deposition that you had not seen a copy of the</p> <p>6 loan agreement?</p> <p>7 MS. CLINE: Objection to the</p> <p>8 form.</p> <p>9 A And you're helping yourself to answer</p> <p>10 your own question. By January, my first</p> <p>11 deposition, I testify I didn't see the law</p> <p>12 agreement which you're helping yourself. I saw</p> <p>13 this law agreement after my first deposition.</p> <p>14 Q Good. And so -- but you cannot tell</p> <p>15 us today when that was. Was it soon after the</p> <p>16 deposition, was it recently before Mr. Grendi left</p> <p>17 the case?</p> <p>18 A I don't remember.</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A I don't remember that.</p> <p>21 Q Once you got the loan document, did</p> <p>22 you question Mr. Han Chunguang about it?</p> <p>23 A Question?</p> <p>24 Q Did you ask him questions about the</p> <p>25 document?</p>
<p style="text-align: center;">Page 110</p> <p>1 YVETTE WANG</p> <p>2 dinner, that should be the first time he clearly</p> <p>3 told me, yes.</p> <p>4 Q So how did this come up that he</p> <p>5 signed it? Did you ask him or did he just</p> <p>6 volunteer that information?</p> <p>7 A He told me.</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A He told me we sign a loan agreement.</p> <p>10 We had a loan agreement.</p> <p>11 Q So he told you two things. One, that</p> <p>12 there was a loan agreement, and two, that he had</p> <p>13 been the signer on behalf of the ACA?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A You remember my first deposition in</p> <p>16 January, 2019, I said I even didn't hear about ACA</p> <p>17 company. My dinner with William was by light</p> <p>18 2018, that dinner. William just told me they sign</p> <p>19 a loan agreement. He didn't even mention to me</p> <p>20 what company.</p> <p>21 Q What company he signed on behalf of?</p> <p>22 A Yes.</p> <p>23 Q Did you understand that it was ACA,</p> <p>24 or did you think it was maybe a different company?</p> <p>25 A When I saw this loan agreement and</p>	<p style="text-align: center;">Page 112</p> <p>1 YVETTE WANG</p> <p>2 Did I read that correctly?</p> <p>3 A Yes.</p> <p>4 Q Now do you recall testifying at your</p> <p>5 deposition that you had not seen a copy of the</p> <p>6 loan agreement?</p> <p>7 MS. CLINE: Objection to the</p> <p>8 form.</p> <p>9 A And you're helping yourself to answer</p> <p>10 your own question. By January, my first</p> <p>11 deposition, I testify I didn't see the law</p> <p>12 agreement which you're helping yourself. I saw</p> <p>13 this law agreement after my first deposition.</p> <p>14 Q Good. And so -- but you cannot tell</p> <p>15 us today when that was. Was it soon after the</p> <p>16 deposition, was it recently before Mr. Grendi left</p> <p>17 the case?</p> <p>18 A I don't remember.</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A I don't remember that.</p> <p>21 Q Once you got the loan document, did</p> <p>22 you question Mr. Han Chunguang about it?</p> <p>23 A Question?</p> <p>24 Q Did you ask him questions about the</p> <p>25 document?</p>

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<p>1 YVETTE WANG</p> <p>2 A I don't remember that.</p> <p>3 Q Do you know who drafted it? Let me</p> <p>4 ask you a different question.</p> <p>5 Who drafted it? Who drafted the loan</p> <p>6 agreement?</p> <p>7 MS. CLINE: Asked and answered.</p> <p>8 You can answer.</p> <p>9 Objection. Asked and answered</p> <p>10 already.</p> <p>11 A I don't know.</p> <p>12 Q Did it go through multiple versions</p> <p>13 before it was signed?</p> <p>14 A I don't know.</p> <p>15 Q Who negotiated the agreement?</p> <p>16 A I heard it was discussed between</p> <p>17 William and Mr. Han.</p> <p>18 Q Who told you that?</p> <p>19 A Both of them.</p> <p>20 Q When did Han Chunguang tell you that</p> <p>21 he negotiated it with William Je?</p> <p>22 A I don't remember that.</p> <p>23 Q Was it in the late summer meeting</p> <p>24 with him?</p> <p>25 A Earlier? Earlier that meeting.</p>	<p>1 YVETTE WANG</p> <p>2 Q Why did Eastern Profit decide to</p> <p>3 approach ACA for a loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A What was the question?</p> <p>6 Q Why did Eastern Profit decide to</p> <p>7 approach ACA for a loan?</p> <p>8 A Because Eastern Profit bank account</p> <p>9 was frozen.</p> <p>10 Q Why did it choose ACA instead of some</p> <p>11 other entity?</p> <p>12 A I heard like William and Mr. Han,</p> <p>13 including their family, they were or they are</p> <p>14 prosecuted and threatened by Chinese Communist</p> <p>15 Party also. So to take down Chinese Communist</p> <p>16 Party is their same goal.</p> <p>17 Q Who told you this?</p> <p>18 A I heard this from both William and</p> <p>19 Mr. Han.</p> <p>20 Q When did Mr. Han tell you this?</p> <p>21 A Many times.</p> <p>22 Q He told you many times that he went</p> <p>23 to ACA for a loan because William Guo's family was</p> <p>24 also being persecuted?</p> <p>25 MS. CLINE: Objection to form.</p>
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<p>1 YVETTE WANG</p> <p>2 My question is: Has he actually told 3 you that the reason that Eastern Profit went to 4 ACA is because Mr. Han thought he had something in 5 common with Mr. G?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 Q That's what I want to know about.</p> <p>8 A Something in common; right? I 9 think, Eddie, you're right.</p> <p>10 Q My question is has Mr. Han told you 11 that? Has he told you that that is why Eastern 12 Profit went to ACA for a loan?</p> <p>13 A Yes.</p> <p>14 Q Okay. How long did the negotiation 15 last?</p> <p>16 A Negotiation about what?</p> <p>17 Q The terms of the loan.</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 A Should not be very long. Quiet 20 quickly.</p> <p>21 Q You say should not be. My question 22 is was it?</p> <p>23 A What's your question?</p> <p>24 Q Did a negotiation take very long?</p> <p>25 A You're asking my personal knowledge</p>	<p>1 YVETTE WANG</p> <p>2 Is there another discussion that you 3 recall having with Mr. Han about the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A Yes.</p> <p>6 Q When? When was that?</p> <p>7 A End of -- I forgot that. I don't 8 remember. Definitely not only one time.</p> <p>9 Q Was it after your first deposition?</p> <p>10 A Before and after. Both.</p> <p>11 Q How many times did you talk with him 12 about the loan before your first deposition?</p> <p>13 A I don't remember that.</p> <p>14 Q How many times did you talk to him 15 about the loan after your first deposition?</p> <p>16 A A couple of times.</p> <p>17 Q So the most recent was at the end of 18 the summer; right?</p> <p>19 A Yes.</p> <p>20 Q There was some time before that that 21 you -- that you also spoke to him about the loan?</p> <p>22 A About the entire case.</p> <p>23 Q And did that include the loan?</p> <p>24 A Yes.</p> <p>25 Q So how long did the -- did the</p>
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<p>1 YVETTE WANG</p> <p>2 or my obtain knowledge?</p> <p>3 Q I'm asking what does Eastern Profit 4 know about its negotiation with ACA? My question 5 is how long did it take?</p> <p>6 MS. CLINE: Asked and answered.</p> <p>7 A Mr. Han mentioned to me he reached 8 out to William asking for loan sharing the same 9 targets investigate and disclosure the corrupted 10 Chinese official. And they went through some 11 discussion, which in my impression is normal, and 12 they sign agreement.</p> <p>13 Q Okay. When did he tell you about 14 these discussions?</p> <p>15 A When; right? Well, I don't remember 16 that.</p> <p>17 Q Was the amount always going to be 18 \$1 million? In other words, did the principle 19 amount change during the negotiations?</p> <p>20 A I didn't hear about that.</p> <p>21 Q Did you ask Mr. Han?</p> <p>22 A No, I didn't.</p> <p>23 Q Just to be clear, I understand that 24 you've had one discussion with Mr. Han about this 25 loan, and that was at the end of the summer.</p>	<p>1 YVETTE WANG</p> <p>2 discussion last over a couple of days between 3 Mr. Han and Mr. Yu, was it wrapped up in half an 4 hour?</p> <p>5 How long did it take them to 6 negotiate the loan agreement?</p> <p>7 MS. CLINE: Asked and answered.</p> <p>8 A I heard like a couple of days.</p> <p>9 Q I notice the interest is 2 percent 10 per month, and it compounds monthly unless 11 otherwise mutually agreed.</p> <p>12 Have the lender and borrower mutually 13 agreed in writing since this loan agreement to 14 remove the 2 percent interest per month 15 compounding feature?</p> <p>16 A That's the question?</p> <p>17 Q Have the lender and borrower mutually 18 agreed in writing since the date of this loan 19 agreement to remove the 2 percent interest per 20 month compounding term?</p> <p>21 A I never heard about this.</p> <p>22 Q Have they made any modifications to 23 the loan agreement?</p> <p>24 A I didn't hear about this.</p> <p>25 Q Is it possible that they did?</p>
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<p>1 YVETTE WANG</p> <p>2 A I cannot guess. I don't know.</p> <p>3 Q Who would have the file that would</p> <p>4 show any modifications to the loan agreement?</p> <p>5 A You are -- Eddie you're asking based</p> <p>6 on imagination. If they ever modify, my guess --</p> <p>7 I know Joanna doesn't want me to guess, so that is</p> <p>8 between Mr. Han and William.</p> <p>9 Q Have you asked Mr. Han if there have</p> <p>10 been any modifications to the loan agreement?</p> <p>11 A I checked with him.</p> <p>12 Q Okay. When did you check with him?</p> <p>13 A I forgot the time when. But I</p> <p>14 remember asking him like roughly what is the term,</p> <p>15 what is interest. And then any other special</p> <p>16 things I should know, or any like change of mind I</p> <p>17 should know.</p> <p>18 Q So if I ask Eastern have there been</p> <p>19 any modifications to the loan agreement, the</p> <p>20 answer is no.</p> <p>21 Is it a firm no, or is it no, but</p> <p>22 there might have been?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A I believe it's a firm no.</p> <p>25 Q The 2 percent interest per month</p>	<p>1 YVETTE WANG</p> <p>2 was taken.)</p> <p>3 THE VIDEOGRAPHER: Good</p> <p>4 afternoon. The time is 2:05 p.m.,</p> <p>5 Wednesday, October 30, 2019. This is</p> <p>6 media number 3 of the videotaped</p> <p>7 deposition of Miss Yvette Wang. We</p> <p>8 are back on the record.</p> <p>9 CONTINUED EXAMINATION</p> <p>10 BY MR. GREIM:</p> <p>11 Q Miss Wang, welcome back. We'll</p> <p>12 return to the topic that we left with before our</p> <p>13 lunch break. That is the ACAEP loan.</p> <p>14 We were talking about the</p> <p>15 negotiations beforehand, and I did not ask you</p> <p>16 whether any of the negotiations occurred by</p> <p>17 E-mail. Did they?</p> <p>18 A You didn't ask me that question.</p> <p>19 Q Correct. Now I am.</p> <p>20 A I don't believe so.</p> <p>21 Q Have you searched for E-mails</p> <p>22 relevant to this topic?</p> <p>23 A My E-mails.</p> <p>24 Q Anyone's E-mails.</p> <p>25 A First --</p>
<p style="text-align: center;">Page 122</p> <p>1 YVETTE WANG</p> <p>2 compounding is a very high APR. You won't have to</p> <p>3 do the math here.</p> <p>4 But my question to you is: Why did</p> <p>5 Eastern Profit agree to such a high interest</p> <p>6 payment?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A I don't think it's high.</p> <p>9 Q Okay. So Eastern Profit does not</p> <p>10 believe that 2 percent per month compounded</p> <p>11 annually is a high interest -- high interest term?</p> <p>12 A Correct.</p> <p>13 Q Has Eastern Profit ever asked ACA to</p> <p>14 lower the amount of the interest?</p> <p>15 A I didn't hear about that.</p> <p>16 MR. GREIM: Let's go ahead and</p> <p>17 take a break.</p> <p>18 THE VIDEOGRAPHER: The time is</p> <p>19 1:20 p.m., Wednesday, October 30,</p> <p>20 2019.</p> <p>21 This is the end of media number</p> <p>22 2 of the videotaped deposition of</p> <p>23 Yvette Wang.</p> <p>24 We're off the record.</p> <p>25 (At this time, a brief recess</p>	<p style="text-align: center;">Page 124</p> <p>1 YVETTE WANG</p> <p>2 MS. CLINE: Let me interject</p> <p>3 here. The performance of the search</p> <p>4 in response to the RFPs was not a</p> <p>5 subject of the deposition notice.</p> <p>6 To the extent you know the</p> <p>7 answer to the question, you may</p> <p>8 answer.</p> <p>9 A First I searched in my E-mail.</p> <p>10 Nothing.</p> <p>11 Q But you weren't involved in the</p> <p>12 negotiation of the loan?</p> <p>13 A You mean before the loan agreement</p> <p>14 was signed; correct?</p> <p>15 Q Correct.</p> <p>16 A Oh. No, not really.</p> <p>17 Q Okay. So does Eastern Profit know</p> <p>18 whether Han Chunguang exchanged any E-mails with</p> <p>19 William Je or any other person about the ACA loan?</p> <p>20 A You're asking did Mr. Han exchange</p> <p>21 the E-mail about this loan; right?</p> <p>22 Q Right. Mm-hmm.</p> <p>23 A He told me the discussion was orally.</p> <p>24 Q How about texts?</p> <p>25 A Orally.</p>

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32 (Pages 122 to 125)

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<p>1 YVETTE WANG 2 Q What, if any, was Guo Wengui's 3 involvement in the discussion of the loan, 4 negotiation of the loan? 5 A I'm not quite clear about his role in 6 this discussion. 7 Q Well, was he acting as Eastern 8 Profits' agent in connection with the loan 9 negotiation? 10 A Correct. 11 Q Was he acting as Eastern Profit's 12 agent -- let me strike that. 13 Has he been the acting as Eastern 14 Profit's agent in connection with discussions with 15 ACA regarding payment or a collection of the loan? 16 A I heard William mention to be paid 17 back to Mr. Guo also. 18 Q Where did you hear that? 19 A From William. 20 Q When did he tell you this? 21 A I forgot the precise words, but my 22 impression is he's chasing everyone he can chase. 23 Q My question was when did William Je 24 mention to you that he had talked to Guo about 25 paying back the loan?</p>	<p>1 YVETTE WANG 2 agent of Eastern Profit with respect to the loan? 3 A I said Mr. Guo acted as an agent on 4 behalf of Eastern Profit to talk with Strategic 5 Vision and Waller and wallop. W-A-L-L-E-R and 6 W-A-L-L-O-P. 7 Q I'm sorry. My question is about the 8 loan, not about the discussions with Strategic 9 Vision. I will be very clear. 10 In fact, let me take a second. 11 Does Mr. Guo have any E-mails or 12 texts that he sent to Mr. Ye or anyone else on 13 Eastern Profit's behalf in connection with the 14 loan? 15 A I don't believe so. 16 Q Did Eastern Profit check for those 17 E-mails or texts before the deposition today? 18 MS. CLINE: Again, that was not 19 a subject of the depo notice. 20 If you know the answer, you may 21 respond. 22 A I asked about the loan agreement. I 23 was advised they were our discussion. 24 So I didn't change further and say 25 let me search your E-mail or search your texts,</p>
<p style="text-align: center;">Page 126</p> <p>1 YVETTE WANG 2 A Should be quite a long time. 2018. 3 Q Is this in the 2018 dinner? 4 A Yes. In a dinner he mentioned to me 5 also, yeah. 6 Q In a dinner or the dinner that we 7 discussed earlier? 8 A I believe we were talking about their 9 dinner. I'm ready to tell you where is the 10 restaurant. 11 Q Where is the restaurant? 12 A Avra. 13 Q Spell that for the record. 14 A A-V-R-A. It's a great seafood 15 restaurant. 16 Q Well, other than Guo and other than 17 Han Chunguang, who else was involved in 18 negotiation of the ACA Eastern Profit loan? 19 A Mei is aware of this loan also. 20 Q Well, you say she is aware. My 21 question is who was involved in the negotiation of 22 the loan? 23 A Oh. Negotiation. William, Mr. Han. 24 Yeah. 25 Q You said Mr. Guo also acted as the</p>	<p>1 YVETTE WANG 2 because I believe I was told the truth. 3 Q Did you ask Mr. Guo that question? 4 A I didn't ask him. I don't remember 5 that. 6 Q Now the research agreement called for 7 a fee of \$750,000 a month; is that right? 8 MS. CLINE: Objection to form. 9 A \$750,000, U.S. dollars, based on 10 their weekly reports and general monthly reports. 11 Without seeing or received the reports, \$750,000 12 U.S. dollars should not be paid. 13 Q What steps, if any, did Eastern 14 Profit take to raise the money for the first 15 \$750,000 payment to Strategic Vision? 16 MS. CLINE: Objection to form. 17 A Sorry. What's the question? Raised 18 the money? 19 Q Sure. 20 A What's the question? 21 Q What steps, if any, did Eastern 22 Profit take to raise the money for the first 23 \$750,000 payment to Strategic Vision? 24 MS. CLINE: So hold your answer 25 for a minute. Again, the Judge has</p>

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<p>1 YVETTE WANG 2 already ruled that the independent 3 financial identity of Eastern Profit 4 is not appropriate, within the 5 appropriate scope of the deposition. Q This goes to these loan agreements and not to the independent financial identity. So my question is: What was Eastern Profit? We saw that it negotiated a loan for the million dollar deposit. What steps was it taking to make the first \$750,000 payment? MS. CLINE: No. I'm going to object, and I'll quote from the judge's order. "To the extent the defendant seeks to inquire further regarding plaintiff's financial situation, his request to do so is denied." Again for failure to establish relevance, this inquiry is beyond the scope of the deposition. Q Was Eastern Profit negotiating with ACA for a second loan to make its first payment? MS. CLINE: Some objection. The</p>	<p>1 YVETTE WANG 2 not know? 3 MS. CLINE: Objection to form. 4 A It's possible. Q All right. Has ACA made a written demand for payment on Eastern Profit? A Written demand. I didn't see that by myself. But I heard possibly, yes. Q Has Eastern Profit received a written demand from ACA for payment? A I didn't check our records. Q Who has the records? A I assume Mr. Han. Q Do you know whether he does? A You're asking me to guess. Q I'm asking Eastern Profit who keeps it's financial records. A You're asking financial records, or you're asking the written demands? This is two things to me added. Q Who keeps Eastern Profit's financial records? A The company itself. Q Which person keeps the financial records?</p>
<p style="text-align: center;">Page 130</p>	<p style="text-align: center;">Page 132</p>

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<p>1 YVETTE WANG 2 A What's the question? 3 Q Does Eastern Profit show this as a 4 loan, this million dollars as a loan on its 5 financial statements? I'm sorry, as a liability 6 on its financial statements? 7 A I believe, yes. 8 Q Do you believe or do you know? 9 A What is difference between I believe 10 and I know? 11 Q Well, you either have seen the 12 financial statement and know it does, or you're 13 guessing because you think it should? 14 MS. CLINE: Objection to form. 15 Q My question is: Does Eastern Profit 16 treat this loan as a liability on its financial 17 statements? 18 A Yes. 19 Q So when did you view the financial 20 statements. 21 MS. CLINE: Objection to form. 22 A I was told by the director and the 23 representative. 24 Q Okay. So Guo Mei and Han Chunguang 25 both told you that they've seen the financial</p>	<p>1 YVETTE WANG 2 should pay back, period. 3 Q Confirmed with who? 4 A They told me. That's why we're suing 5 here. 6 Q Who told you? 7 A Eastern Profit. 8 Q And who from Eastern Profit told you? 9 A Both of them. They told me. 10 Q Guo Mei and Han Chunguang? 11 A Correct. 12 Q And have you already described the 13 conversations where this occurred? These are the 14 conversations that you had with them in the summer 15 of this year? 16 MS. CLINE: Objection to form. 17 A You're confusing me again. What's 18 the question? 19 Q You already told us about the 20 conversations where Guo Mei and Han Chunguang told 21 you about this. 22 A Told who? 23 Q You. Told you about this. 24 A Who told me? 25 Q Guo Mei and Han Chunguang.</p>
<p style="text-align: center;">Page 134</p> <p>1 YVETTE WANG 2 statements and that Eastern Profit treats the 3 million dollars as a liability? 4 MS. CLINE: Objection to form. 5 Mischaracterizes testimony. Beyond 6 the scope of the deposition. 7 A What's your question? 8 Q Did Guo Mei tell you that she had 9 seen the financial statements of Eastern Profit? 10 MS. CLINE: Again, objection. 11 This is beyond the scope of the 12 court's order, and anything we've 13 agreed to. We're not going to have 14 her testify about the financial 15 identity or the final situation of 16 the plaintiff. 17 Q I don't care about the financial 18 situation. I want to know whether this entity 19 recognizes this as a loan that it actually has to 20 repay? 21 MS. CLINE: Asked and answered. 22 MR. GREIM: I would like to 23 know. 24 A Eastern Profit confirmed, reconfirmed 25 again, again. This is a loan Eastern Profit</p>	<p style="text-align: center;">Page 136</p> <p>1 YVETTE WANG 2 A Mm-hmm. 3 Q Have you already told us about the 4 conversation in which Guo Mei and Han Chunguang 5 told you that it considers this million dollars to 6 be a loan from ACA. 7 A I just told you. Yes, I did tell 8 you. 9 Q And those were the summer of 2019 10 discussions? 11 MS. CLINE: Objection to form. 12 A Wow. Many times. I don't remember 13 them. 14 Q So are you now telling me that you've 15 talked to Han Chunguang many times about this 16 loan? 17 MS. CLINE: Objection to form. 18 A I'm telling you they are aware of 19 this litigation and the other meet. This is a 20 loan need to be paid back. And they're asking me 21 what is the litigation going on and when we can 22 get \$1 million from the two liars back. 23 Q Could you look at Exhibit 31? 24 A Sure. 25 Q This is the loan agreement. Go to</p>

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<p>1 YVETTE WANG</p> <p>2 the very back.</p> <p>3 A Which page?</p> <p>4 Q Page 3. Was Chu -- do you see</p> <p>5 Chunguang Han's signature? Do you see it?</p> <p>6 A I see a signature behind Chunguang</p> <p>7 Han's name.</p> <p>8 Q Is that his signature?</p> <p>9 MS. CLINE: Objection.</p> <p>10 Foundation.</p> <p>11 A This is a accurate, as you said, true</p> <p>12 loan agreement. Of course this is his signature.</p> <p>13 What do you mean, like someone made up? I don't</p> <p>14 understand your question.</p> <p>15 Q I'm asking Eastern Profit if this is</p> <p>16 really its director's signature.</p> <p>17 A I'm telling you this is a true loan</p> <p>18 agreement. So the signature on this loan</p> <p>19 agreement, they are accurate and true.</p> <p>20 Q And how do you know that this is a</p> <p>21 true loan agreement; did someone tell you this?</p> <p>22 MS. CLINE: Objection. Asked</p> <p>23 and answered. You're badgering the</p> <p>24 witness. You asked her about the</p> <p>25 signature. She answered the</p>	<p>1 YVETTE WANG</p> <p>2 Q Whose name is it?</p> <p>3 A It's a signature.</p> <p>4 Q Of who?</p> <p>5 A It could be a (inaudible) or any</p> <p>6 symbolic.</p> <p>7 Q Let's go ahead and get it out. We</p> <p>8 have it.</p> <p>9 A Let's get it.</p> <p>10 (Wang Exhibit 2, Research</p> <p>11 Agreement dated December 29, 2017</p> <p>12 Bates stamped Eastern-000005 to</p> <p>13 Eastern 000009 previously marked for</p> <p>14 Identification as of this date.)</p> <p>15 Q I'm going to show you what we marked</p> <p>16 in your first deposition as Wong 2.</p> <p>17 Do you recognize this document? The</p> <p>18 question pending is whether you recognize the</p> <p>19 document.</p> <p>20 A I'm preparing to answer your</p> <p>21 question.</p> <p>22 Q Just making sure.</p> <p>23 A Yes.</p> <p>24 Q What is it?</p> <p>25 A It's called a Research Agreement.</p>
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<p>1 YVETTE WANG</p> <p>2 question.</p> <p>3 Q Other than Mr. Grendi, has anyone</p> <p>4 else told you this is Mr. Chunguang Han's</p> <p>5 signature?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 Mischaracterizes testimony.</p> <p>8 Q Did you sign Chunguang Han's</p> <p>9 signature on the research agreement in this case?</p> <p>10 A Pardon?</p> <p>11 Q Did you sign Chunguang Han's</p> <p>12 signature on the research agreement at issue in</p> <p>13 this case?</p> <p>14 A How I can sign his signature?</p> <p>15 Q Do you sign his name to the research</p> <p>16 agreement in this case?</p> <p>17 A You're confusing me. Which</p> <p>18 agreement?</p> <p>19 Q The research agreement at issue in</p> <p>20 this case.</p> <p>21 A That is a signature I was authorized</p> <p>22 to sign.</p> <p>23 Q So you were authorized to write his</p> <p>24 name on that document?</p> <p>25 A I don't believe that's his name.</p>	<p>1 YVETTE WANG</p> <p>2 Q It's an agreement that you signed in</p> <p>3 French Wallop's presence; isn't it?</p> <p>4 A Yes.</p> <p>5 Q And whose name did you sign?</p> <p>6 A I didn't. I did not mean to sign</p> <p>7 anyone's name here.</p> <p>8 Q Did you sign any name?</p> <p>9 A Are you Chinese Mandarin,</p> <p>10 linguistics? Do you read Mandarin?</p> <p>11 Q Answer the question. Whose name did</p> <p>12 you sign?</p> <p>13 A I didn't sign anyone's name. This is</p> <p>14 a signature.</p> <p>15 Q What does it read?</p> <p>16 A It's simple.</p> <p>17 Q So this is not a name? I'm</p> <p>18 indicating the Chinese handwriting on page 3.</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A It could be a name.</p> <p>21 Q What is it? Whose name is this?</p> <p>22 A I am authorized to sign this contract</p> <p>23 on behalf of Eastern Profit Limited. I sign here.</p> <p>24 This is my signature on behalf of Eastern Profit</p> <p>25 Limited.</p>
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<p>1 YVETTE WANG 2 Q Fair enough. 3 A I can say this is my name. I can say 4 this is in my English name or Chinese name, and 5 this is my authorized signature here. 6 (Indicating) 7 Q My question is whose name is it? 8 A Nobody's name. 9 Q So a Mandarin speaker would look at 10 this and say this is just squiggly lines, it's no 11 one's name. Does it make out a name? 12 A I don't know think any Mandarin say 13 this name. 14 Q This is Han Chunguang's name; isn't 15 it? 16 A I didn't say that. 17 Q I'm asking you. Is this Han 18 Chunguang's name? 19 A I didn't say that. I don't think it 20 is. 21 Q Okay. So your testimony under oath 22 is that you did not sign Han Chunguang's name? 23 A Correct. 24 Q You signed -- did you sign any name? 25 MS. CLINE: Objection. Asked </p>	<p>1 YVETTE WANG 2 Q What date was that signed? 3 A You mean as Power of Attorney? 4 Q Yes. 5 MS. CLINE: Just to be clear, is 6 your line of inquiry -- this is the 7 Eastern Profit 30(b)(6). Your line 8 of inquiry, am I correct, relates to 9 your authority on behalf of Eastern 10 Profit. 11 MR. GREIM: Correct. 12 A What's your question? 13 Q When was the limited Power of 14 Attorney signed? 15 A You went me to read this; right? 16 Q Just answer the question. 17 A I need to know the question. What 18 was the question? 19 Q The question is: When was the 20 limited Power of Attorney signed? When was it 21 signed? 22 A August 30, 2018. 23 Q Right. So my question is how did you 24 get your authority; was it orally, or was it in 25 writing, on or before January 6, 2018 to affix </p>
<p style="text-align: center;">Page 142</p>	<p style="text-align: center;">Page 144</p>
<p style="text-align: center;">Page 143</p>	<p style="text-align: center;">Page 145</p>

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1 YVETTE WANG
 2 number 2 on them.
 3 THE WITNESS: Can I answer?
 4 MS. CLINE: Yes.
 5 A I was authorized both by orally and
 6 Power of Attorney.
Q What was the first word?
 8 A Orally. O-R-A-L-L-Y.
Q So is there another Power of Attorney
 10 **that predates Guo Exhibit 2?**
 11 MS. CLINE: Again, the questions
 12 that have to do with Golden Spring
 13 and Golden Spring's authority are for
 14 a separate deposition.
 15 MR. GREIM: I agree.
 16 MS. CLINE: Right now we're
 17 talking about Eastern Profit.
 18 MR. GREIM: Yup. That's exactly
 19 right.
Q So the question is -- first of all,
 21 **Exhibit 2, Wang Exhibit 2, the Research Agreement**
 22 **was signed by Eastern Profit; right?**
 23 A Correct.
Q So you've just testified that you
 25 **received the authority to sign by Eastern Profit**

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1 **YVETTE WANG**
 2 MS. CLINE: Objection to form.
 3 Mischaracterizes the document.
 4 THE WITNESS: Should I answer?
 5 MS. CLINE: You can answer.
 6 A I don't remember the dates. 80
 7 percent. Again, she doesn't want me to guess.
 8 I sign this research agreement based
 9 on a firm, confirmative, very firm, F-I-R-M, oral
 10 authorization.
Q From who?
 12 A From Mr. Han.
Q When did he give you the oral
 14 **authorization to sign the research agreement?**
 15 A December, 2017.
Q Okay. When in December of 2017? A
 17 **lot of negotiations in that month.**
When in December of 2017 did Mr. Han
 19 **give you this authority?**
 20 A I don't remember the dates, but it
 21 was before we entered into this research
 22 agreement.
Q So did you discuss with Mr. Han the
 24 **terms of the research agreement?**
 25 A Nope.

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1 **YVETTE WANG**
 2 **from two different sources, orally and by limited**
 3 **Power of Attorney.**
 4 **So my first question is what is the**
 5 **limited Power of Attorney that authorized you to**
 6 **sign the research agreement for Eastern Profit?**
 7 MS. CLINE: Objection to form.
 8 A I have to correct my linguistic or
 9 your understanding. I told you orally or Power of
 10 Attorney.
Q Okay. So is it your testimony that
 12 **there is a Power of Attorney that granted you the**
 13 **authority to sign Wang Exhibit 2, or are you**
 14 **saying there is no limited Power of Attorney?**
Which one is it?
 16 A I repeat again. I was authorized by
 17 eastern both orally and Power of Attorney.
Q I see. And so we just looked at one
 19 **Power of Attorney, but it mentions Golden Spring,**
 20 **and it's from later in the year.**
 21 MS. CLINE: Objection to form.
Q So my question is is there some other
 23 **Power of Attorney that I haven't seen yet that**
 24 **gave you the authority to sign the research**
 25 **agreement on behalf of Eastern Property?**

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1 **YVETTE WANG**
Q Did you translate it for him?
 3 A He didn't ask. I don't remember I
 4 offered.
Q Did you talk to Mr. Chunguang about
 6 **the deal with Strategic Vision?**
 7 A Yes, I did.
Q Did he give you approval that he
 9 **agreed with the deal?**
 10 A He authorized me to deal with this
 11 deal. But he is aware we're trying to disclosure
 12 the Chinese corrupted official by investigation.
 13 And he is on same page with us, which means he
 14 agree with what we are doing.
Q So how did you know that that was the
 16 **purpose of the research agreement?**
 17 MS. CLINE: I'm sorry. I was
 18 coughing. Can I hear that back.
 19 (The requested portion of the
 20 record was read back by the
 21 reporter.)
 22 MS. CLINE: Objection to form.
 23 A How did I know? I don't remember
 24 that clearly, but I heard -- this is about Chinese
 25 corrupted official. They're illegal like

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<p>1 YVETTE WANG 2 investigation from Miles and from Wallop, Waller. 3 Both. 4 I don't remember like which dates, 5 the precise language, but Miles is looking for 6 some professional company, and Waller, Wallop 7 represented themselves, the best research company, 8 professional qualified who can help our research. 9 So I got to know about this research from there. 10 Q Why did you -- what made you 11 understand that Mr. Han was the person to go to 12 for authority to sign the research agreement? 13 MS. CLINE: Objection to form. 14 A What's the question? 15 Q How did you come to understand that 16 Mr. Han was the person for you to go to seek 17 authority to sign the research agreement? 18 MS. CLINE: Objection to form. 19 A Because Waller and Wallop, obviously 20 they did not want Mile's name on any of the 21 contracts. 22 Q I'm sorry? 23 A I didn't finish. 24 Q Okay. Go ahead. 25 A And Miles, he expressed okay. Let's </p>	<p>1 YVETTE WANG 2 How did you know Mr. Han was the person to go to 3 to get authority from Eastern Profit? 4 MS. CLINE: Objection to form. 5 A I started to ask and look for someone 6 as I just said. It was Mr. Han. He mentioned to 7 me Eastern Profit could be on the contract. 8 Q This is Chunguang Han? 9 A Mr. Han. 10 Q Han Chunguang; right? 11 A Correct. He gave me Eastern Profit's 12 name. 13 Q So the person who suggested Eastern 14 Profit to take Mr. Guo's place was Han Chunguang? 15 MS. CLINE: Objection to form. 16 A What do you mean take Mr. Guo's 17 place? 18 Q Who was the first person who 19 mentioned Eastern Profit to you? 20 A I don't remember clearly. It could 21 be either Mr. Han or Mr. Guo, but I don't remember 22 that clearly. 23 Q You remember testifying at your first 24 deposition it was Mr. Guo? 25 A You want me to read the page? Which </p>
<p style="text-align: center;">Page 150</p>	<p style="text-align: center;">Page 152</p>

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<p>1 YVETTE WANG 2 Q Okay. Now do you recall now that you 3 testified that Mr. Guo introduced you to Eastern 4 Profit?</p> <p>5 MS. CLINE: Objection to form. 6 A Now I do. 7 Q All right. I don't want to get you 8 too far down the road with Han Chunguang, because 9 I remember his testimony.</p> <p>10 So how is it then that you learned 11 that Han Chunguang had anything to do with Eastern 12 Profit?</p> <p>13 A What's the question? 14 Q How did you learn that Han Chunguang 15 had anything to do with Eastern Profit?</p> <p>16 A How did I learn? 17 Q Mm-hmm. 18 A That was I asked him there's a 19 project in here, kind of like are you interested. 20 And then he told me Eastern Profit probably could 21 join this project.</p> <p>22 Q Han Chunguang said this to you? 23 A I don't remember the precise words 24 quote, okay. That is my impression. I was asking 25 him, and then he agree with our big goal, to take</p>	<p>1 YVETTE WANG 2 A Should I continue? 3 Q Go ahead. I'm sorry. I thought you 4 were done.</p> <p>5 A He told me Eastern Profit could be 6 onboard. I can go ahead to sign a contract. 7 Q Did he explain to you what his 8 relationship with Eastern Profit was?</p> <p>9 A I forgot the precise words he told 10 me, but he expressed he was or he is running 11 Eastern Profits, and he told me Eastern Profits 12 will be on the same side with our big anti-CCP, 13 Chinese Communist Party.</p> <p>14 Q Did Mr. Han tell you what his duties 15 and responsibilities were?</p> <p>16 A He was running. My impression is he 17 was running.</p> <p>18 Q Who told you he was the, quote, 19 principal of Eastern?</p> <p>20 MS. CLINE: Objection to form. 21 A Called principal.</p> <p>22 Q Who told you that he was the 23 principal of Eastern?</p> <p>24 MS. CLINE: Objection to form. 25 A That is my understanding, he's the</p>
<p style="text-align: center;">Page 154</p> <p>1 YVETTE WANG 2 down CCB. And he said kind of like it's a great 3 job. Let's do it.</p> <p>4 Q Who told you that Han Chunguang had 5 any authority to act on behalf of Eastern Profit?</p> <p>6 MS. CLINE: Objection to form. 7 A You mean when?</p> <p>8 Q No. Who. Who told you that Han 9 Chunguang had any authority to act on behalf of 10 Eastern Profit?</p> <p>11 A Mei told me.</p> <p>12 Q When did she tell you that?</p> <p>13 A I forgot the precise time. It should 14 be sometime in 2018.</p> <p>15 Q Okay. But back in December of 2017, 16 all right --</p> <p>17 A Yes.</p> <p>18 Q -- when you testified that Han 19 Chunguang gave you authority to sign the research 20 agreement on behalf of Eastern Profit, who told 21 you that Han Chunguang had any authority to speak 22 on behalf of Eastern Profit?</p> <p>23 MS. CLINE: Objection to form. 24 A He told me.</p> <p>25 Q He told you?</p>	<p style="text-align: center;">Page 156</p> <p>1 YVETTE WANG 2 principal.</p> <p>3 Q And who told you that?</p> <p>4 A Mr. Han expressed Eastern could be 5 onboard and he runs eastern. So I recognize him. 6 He is a principal.</p> <p>7 And later on Mei confirmed her 8 authorization to Mr. Han also which double confirm 9 my recognition to Mr. Han as the principal of 10 Eastern Profit.</p> <p>11 Q Do you remember testifying at your 12 deposition in January that you didn't know what 13 Mr. Han's duties and responsibilities were, and it 14 was Mr. Guo who told you he was the principal of 15 Eastern?</p> <p>16 MS. CLINE: Objection to form. 17 A Which page?</p> <p>18 Q Page 97. You can start up on 96 if 19 you want to. The person starts asking about 20 Chunguang Han at line 13.</p> <p>21 All right Miss Wang, do you see that 22 the questioner asked you at the bottom of 96, he 23 says, line 18: What is his exact position 24 Eastern?</p> <p>25 You answer: He is the President of</p>

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<p>1 YVETTE WANG 2 Eastern. It should be on the paper here. 3 Question: It just says he's a 4 principal. Answer: Okay. Okay, the principal of 5 Eastern. 6 Question: What does that mean? 7 Answer: You mean my understanding? 8 Now onto 97. 9 Question: Yes. 10 Answer: Boss, I don't know. I don't 11 know his official title question. 12 Question: Is he an officer, 13 director? 14 Answer: I don't know. 15 Question: Do you know what his 16 duties and responsibilities are. 17 Answer: I don't know. 18 Question: How did you know he was a 19 principal? 20 Answer: Mr. Guo told me. 21 Did I read that correctly? 22 A You did that great. 23 Q Okay. That was your testimony in 24 January; correct? 25 A Correct.</p>	<p>1 YVETTE WANG 2 A What's your question? 3 Q Are you saying that you did not know 4 about your own conversation with Guo Mei or Han 5 Chunguang when you first testified in January of 6 2019? 7 MS. CLINE: Objection to form. 8 Q Did you learn something new about 9 those discussions since January? 10 A What is your precise question? 11 Q In January when you first testified, 12 you were only about what, a year removed from 13 these events; right? 14 A January, my first deposition, until 15 now is about 10 month. 16 Q So that these 10 months, did you find 17 additional communication between yourself and 18 Mr. Chunguang or Guo Mei to remind you that, in 19 fact, they're the ones who told you what Han 20 Chunguang's role was? 21 A As I just testified, I did talk with 22 Mei and Mr. Han in the summer, and later summer, 23 which is between my first deposition and now. 24 Q Okay. 25 A I understand. I start to recognize</p>
<p style="text-align: center;">Page 158</p> <p>1 YVETTE WANG 2 Q So now you're telling us that in fact 3 Guo Mei and Han Chunguang himself told you these 4 things? 5 A First -- 6 MS. CLINE: Objection to form. 7 Go ahead. 8 A I don't know what paper here mean. 9 Okay? I have no memory about here. Paper here. 10 What's the paper here first. Second, why I am 11 here today for you Eddie, because the judge 12 ordered clearly in October 28th order for this 13 deposition saying Wang, Yvette Wang, me. I was 14 not prepared enough for my first deposition which 15 means from my first deposition until now, 10 16 months, I learned more knowledge and information 17 than 10 month ago. 18 Q But this is about your own 19 interaction with Mr. Guo. This is not about 20 information that somebody else told you. You're 21 testifying about your own interactions; aren't 22 you? 23 MS. CLINE: Objection. 24 Argumentative. Asked and answered. 25 Calm down.</p>	<p style="text-align: center;">Page 160</p> <p>1 YVETTE WANG 2 as a 31B witness. I need to find out information, 3 which means as judge directed on October 28th, I'm 4 allowed to prepare for my today deposition. 5 Q We want you to do so. However, are 6 you telling me that -- maybe we misunderstood your 7 testimony here. 8 My question to you was before you 9 signed the research agreement back on January 6, 10 2018, did Guo Mei or any other person -- did any 11 person other than Guo Wengui tell you that Han 12 Chunguang had authority to act on behalf of 13 Eastern Profit? 14 MS. CLINE: Objection to form. 15 A Before the contract signed? 16 Q Right. 17 A I don't remember that clearly. But 18 based on my memory, which I worked after my first 19 deposition, I was looking for someone who can join 20 this project. Then Mr. Guo looking for also, I 21 guess. I cannot represent him. 22 His agent on behalf of Eastern with 23 strategic equation, which means possibly when I 24 was talking with Mr. Han, and Mr. Guo talked with 25 him also, which I don't know. So it's right</p>

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<p>1 YVETTE WANG 2 before and after those couple of days. I don't 3 have the precise dates. 4 Q You first learned of Eastern Profit's 5 existence just before going down to Virginia to 6 sign the contract with Miss Wallop; isn't that 7 right? 8 MS. CLINE: Objection to form. 9 A That's correct. 10 (Wang Exhibit 4, a document 11 titled Research Agreement dated 12 January 1, 2018 and Bates stamped 13 Eastern-000001 to Eastern-000004 14 previously marked for Identification 15 as of this date.) 16 Q I'm going to hand you what we marked 17 in the original deposition as Exhibit 4. I'm 18 giving you another copy for your attorney. 19 This is Wong Exhibit 4, Eastern Bates 20 numbers 1 through 4. This is a document that you, 21 or that Eastern produced to us in this case. And 22 if you want, you can compare it. Maybe it will be 23 helpful to compare it to the actual research 24 agreement which is Exhibit -- Wang Exhibit 2. 25 You'll see they're not the same</p>	<p>1 YVETTE WANG 2 Q Do you recall this being -- first of 3 all, the agreement wasn't signed on January 1; was 4 it? 5 A You're right. 6 Q And do you recall this being a draft 7 of the agreement, at least a draft, maybe not the 8 only draft, as of January 1, 2018? 9 MS. CLINE: Exhibit 41. 10 MR. GREIM: Yes, Exhibit 4. 11 A It has been almost 20 months. I 12 don't remember clearly what was the negotiation, 13 but since this is Eastern, we produce this. I 14 have to say yes. 15 Q And do you recall that at this time I 16 won't -- I don't want to characterize this the 17 wrong way, but do you agree that at this time 18 Eastern Profit had not been identified yet as the 19 entity that would be entering the contract? 20 MS. CLINE: At which time? 21 MR. GREIM: As of January 1, 22 2018. 23 A You are asking me by January 1, 2018, 24 Eastern Profit was not recognized? 25 Q Right.</p>
<p style="text-align: center;">Page 162</p> <p>1 YVETTE WANG 2 document; are they? 3 A You're right. 4 Q Wang Exhibit 4 doesn't have 5 signatures on it; right? 6 A Correct. 7 Q It doesn't have the same payment 8 terms. The amount is only \$250,000. If you look 9 on page 4 of Wang Exhibit 4, do you see that? 10 A I'm reading this. You want me just 11 to read this paragraph; right? 12 Q Yeah. My only question is I just 13 wanted you to look at the payment terms paragraph. 14 And I'm just asking you to see that this is only 15 \$250,000 a month in this draft; is that right? 16 A Correct. 17 Q And strategic was demanding a much 18 higher amount, which it ultimately got, \$750,000 a 19 month; isn't that right? 20 MS. CLINE: Objection to form. 21 A Correct. 22 Q If you go to the front of Wong 23 Exhibit 4, you see the date typed up in the top is 24 January 1, 2018? 25 A Yes.</p>	<p style="text-align: center;">Page 164</p> <p>1 YVETTE WANG 2 A No. I don't agree with you. 3 Q Okay. Okay. 4 So when was Eastern Profit first 5 identified as the contracting party for we'll call 6 it your side of the contract? 7 A Was identified? You mean confirmed 8 or found; right? 9 Q Sure. 10 A I don't remember that clearly, but I 11 started to talk to Hank kind of like November 12 earliest, November, December of 2017. 13 Q But you testified that you didn't 14 learn the name of Eastern Profit until just before 15 going down to Virginia to negotiate with French 16 Wallop. So how could Eastern Profit have been 17 identified back in November of 2017? 18 MS. CLINE: Objection to form. 19 Mischaracterizes testimony. 20 A Why before? Like two hours right 21 before I came down to Virginia? I'm talking about 22 like a month or two month. Less than two month. 23 I don't think that is a long time. I can still 24 quote that as right before. 25 Q Is it your testimony that you first</p>

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<p>1 YVETTE WANG</p> <p>2 learned that Eastern Profit would be the 3 contracting party in November of 2017?</p> <p>4 A I don't remember that clearly, but 5 it's for sure the latest is November -- no, 6 December or even November, late November of 2017.</p> <p>7 Q Mr. Chunguang Han is not a director 8 of Eastern Profit, is he?</p> <p>9 A You're asking about now?</p> <p>10 Q Right.</p> <p>11 A He is not.</p> <p>12 Q Between September, 2017 and March, 13 2018 he was not a director of Eastern Profit, was 14 he?</p> <p>15 A Between September of 2017 until when?</p> <p>16 Q March, 2018 he was not a director, 17 was he?</p> <p>18 A He was not.</p> <p>19 Q Is there any document appointing 20 Mr. Han as any sort of an officer or 21 representative of Eastern Profit for the period 22 September, 2017 to March, 2018?</p> <p>23 A He is authorized.</p> <p>24 Q My question is is there a document 25 giving him that authority?</p>	<p>1 YVETTE WANG</p> <p>2 me also, but I don't remember that clearly.</p> <p>3 Q Okay. So other than a recollection 4 that at some point Mr. Han and Miss Mei told you 5 that he had authority to act for Eastern Profit 6 between September, 2017 and March, 2018, can 7 Eastern Profit point to any other documents 8 reflecting that he had that role?</p> <p>9 A I didn't ask.</p> <p>10 Q Do they exist? Do the documents 11 exist?</p> <p>12 A I did not ask.</p> <p>13 MR. GREIM: Why don't we take a 14 short break. Let's take a 15 five-minute break.</p> <p>16 THE VIDEOGRAPHER: The time is 17 3:25 p.m., Wednesday, October 30, 18 2019.</p> <p>19 This is the end of media number 20 3 of the videotaped deposition of 21 Yvette Wang.</p> <p>22 We're off the record. 23 (At this time, a brief recess 24 was taken.)</p> <p>25 THE VIDEOGRAPHER: The time is</p>
<p style="text-align: center;">Page 166</p>	<p style="text-align: center;">Page 168</p>

<p>1 YVETTE WANG</p> <p>2 A I didn't remember I saw that document 3 paper, no.</p> <p>4 Q Why do you believe he is authorized? 5 Let's stick to the period of September of 2017 to 6 March, 2018.</p> <p>7 Why does Eastern Profit say he's 8 authorized to act during that period?</p> <p>9 A September, 2017 until March, 2018; 10 right?</p> <p>11 I don't remember the precise words. 12 My impression is I was told he was the director. 13 He is still running the company authorized by the 14 director.</p> <p>15 And then later on Mei confirmed 16 Mr. Han made the correct representation about 17 himself and his wife.</p> <p>18 Q Okay. So who is the person that told</p> <p>19 you that he had been given authority to act on 20 behalf of Eastern Profit between September, 2017 21 and March, 2018?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 Asked and answered.</p> <p>24 A Mr. Han, he expressed it to me. I 25 don't remember clearly. Miss Mei mentioned it to</p>	<p>1 YVETTE WANG</p> <p>2 3:39 p.m., Wednesday, October 30, 3 2019. This is media number 4 of the 4 videotaped deposition of Miss Yvette 5 Wang. We're back on the record.</p> <p>6 CONTINUED EXAMINATION</p> <p>7 BY MR. GREIM:</p> <p>8 Q All right, Miss Wang. Welcome back. 9 Based on your most recent testimony, 10 it sounds like there are two individuals who we 11 can say had knowledge of the negotiation of the 12 contract between Eastern Profit and Strategic 13 Division, Guo Mei and Han Chunguang. Is that 14 correct?</p> <p>15 MS. CLINE: Objection.</p> <p>16 Q Let me strike that.</p> <p>17 A Too long a question. I going to 18 forget.</p> <p>19 Q Is it fair to say that Han Chunguang</p> <p>20 and Guo Mei had knowledge of Eastern Profit's 21 negotiation of the contract with Eastern -- with 22 Strategic Vision?</p> <p>23 A You're talking about this research 24 agreement; right?</p> <p>25 Q I am.</p>
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<p>1 YVETTE WANG</p> <p>2 A They don't have the details like in 3 terms of this contract. But they know or they 4 knew we hired a so-called professional 5 investigation company which really Shell Company 6 and liars.</p> <p>7 Q But if I understand you correctly, 8 you have now testified that Han Chunguang knew of 9 the agreement before it was signed, approved of 10 its purpose, and authorized you to sign it?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 Q Is that correct?</p> <p>13 A Mr. Han did not get that deeply 14 involved.</p> <p>15 Q However, it is true, isn't it, that 16 you told Han Chunguang about the contract, you 17 told him about the goals of the contract, and you 18 asked for his authority to sign it.</p> <p>19 That is your testimony today; isn't 20 it?</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 A I told him we found a research 23 company. Miles was meeting with their 24 representatives. They seem like qualified and 25 professional by them. Most likely we can contract</p>	<p>1 YVETTE WANG</p> <p>2 Q Very good. Please take a look at 3 what we marked in your other deposition as Wang 4 Exhibit 3.</p> <p>5 (Wang Exhibit 3, a document 6 titled Plaintiff Eastern Profit 7 Corporation Limited's Responses and 8 Objections to Defendant Strategic 9 Vision US, LLC's First Set of 10 Interrogatories previously marked for 11 Identification as of this date.)</p> <p>12 Q Do you recognize these as Eastern 13 Profit Limited's responses and objections to 14 Strategic Vision's first set of interrogatories? 15 You'll see that the second to last 16 page you have signed it, and Karen Maistrello 17 notarized your signature on December 20, 2018.</p> <p>18 A You want me to read through all the 19 pages?</p> <p>20 Q No. I'm just asking do you remember 21 verifying the interrogatory responses on behalf of 22 Eastern Profit in this case. That's you, isn't 23 it? You signed this?</p> <p>24 A Correct.</p> <p>25 Q Then if you go to page 1 -- I'm</p>
<p style="text-align: center;">Page 170</p> <p>1 YVETTE WANG</p> <p>2 them, start research.</p> <p>3 Q And before January 6, he told you 4 that you can sign the agreement; is that right?</p> <p>5 A After I told him that, he said please 6 go ahead. You are the miles. We believe you 7 guys. Go ahead with this company.</p> <p>8 Q And your testimony also is that the 9 reason you believed you had authority or -- I'm 10 sorry. Let me strike that.</p> <p>11 The reason you believe that Han had 12 authority to give you that approval, is that Han 13 told you he had the authority and Guo Mei may told 14 you he had the authority before you signed the 15 contract; is that right?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 A Before I sign a contract I was 18 authorized to proceed and execute with this 19 contract. I was told I'm authorized to sign it.</p> <p>20 Q My question though is who told you 21 that Han Chunguang could give you the authority 22 to sign the contract? Who told you Han Chunguang 23 had the authority on behalf of Eastern Profit?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 A Both Mr. Han and Miss Mei.</p>	<p style="text-align: center;">Page 172</p> <p>1 YVETTE WANG</p> <p>2 sorry, page 2, question 1, you see the very first 3 thing says: Identify all persons with whom 4 Eastern consulted when answering these 5 interrogatories or who were otherwise involved in 6 any way in answering these interrogatories?</p> <p>7 Do you see that question? Then in 8 response, first Eastern objects, and then the 9 second sentence you see where it says subject to 10 Eastern's objection, Yvette Wong and Guo Wengui 11 were consulted with answering these 12 interrogatories.</p> <p>13 Did I read that right?</p> <p>14 A Yes.</p> <p>15 Q In fact you did consult with Guo 16 Wengui when answering these interrogatories; 17 didn't you?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 A I don't remember. This is the 20 conversation my lawyer worked with.</p> <p>21 Q Then let's turn to -- well, let me 22 ask you: Did you provide any input into these 23 interrogatory responses?</p> <p>24 MS. CLINE: That's a yes or no 25 question.</p>

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<p>1 YVETTE WANG 2 A Yes. 3 Q Now let's go to item 5. It says: 4 Identify each person with knowledge of the 5 agreement including the negotiation of same. 6 Do you see that? 7 A Yes. 8 Q Then the response starts with an 9 objection under Local Rule 33.3. And then it 10 continues: Subject to Eastern's objection, French 11 Wallop, J. Michael Waller, Yvette Wang, Lianchao 12 Han, Guo Wengui and Gary Smith have knowledge of 13 the agreement, including the negotiation of the 14 same. 15 Did I read that right? 16 A Yes. 17 Q You did not list Guo Mei or Han 18 Chunguang in this answer; did you? 19 MS. CLINE: Objection to form. 20 Mischaracterizes the interrogatory 21 process. 22 A Correct. 23 Q When was Mr. Guo designated an agent 24 by Eastern Profit for purposes of negotiating the 25 agreement?</p>	<p>1 YVETTE WANG 2 extent it calls for a legal 3 conclusion. 4 A I'm still confused by your question. 5 Q Well, Eastern Profit negotiated this 6 agreement through somebody; right? There is an 7 actual person doing the negotiation. Do you agree 8 with me? 9 A Yes. 10 Q And Eastern Profit has admitted that 11 Guo was its agent for purposes of the contract 12 negotiations; right? 13 A Yeah. 14 Q And my question is was there a time 15 when someone else was Eastern Profit's agent for 16 purposes of negotiating the agreement? 17 MS. CLINE: Objection to form. 18 A Negotiation about the agreement; 19 right? 20 Q Correct. 21 A Myself. 22 Q Okay. Were you an agent negotiating 23 on behalf of Eastern Profit for any time before 24 Mr. Guo began negotiating on behalf of Eastern 25 Profit?</p>
<p style="text-align: center;">Page 174</p> <p>1 YVETTE WANG 2 A I do not know the precise date, 3 because in the very beginning remember I was not 4 involved here. So that was Lianchao Han involved 5 by that part. 6 Q Fair enough. I'm asking Eastern 7 Profit when it designated Mr. Guo as agent for 8 purposes of negotiations. 9 MS. CLINE: I'm not sure that 10 was the topic of the deposition 11 notice. 12 You can answer if you know. If 13 you don't know, that's your 14 testimony. 15 A I will try to help you. At least in 16 December of 2017. 17 Q But your testimony is that Eastern 18 Profit may have been identified as the signer of 19 this agreement as early as November? 20 MS. CLINE: Objection to form. 21 A What's the question? 22 Q My question is: Was there ever a 23 period where Eastern Profit was negotiating the 24 agreement, and Mr. Guo was not its agent? 25 MS. CLINE: Objection to the</p>	<p style="text-align: center;">Page 176</p> <p>1 YVETTE WANG 2 A What's the question? I'm sorry. 3 Q My question is was there a period 4 before Mr. Guo began negotiating on behalf of 5 Eastern Profit when you were negotiating on behalf 6 of Eastern Profit? 7 MS. CLINE: Objection to form. 8 Again, this is not -- this is not 9 within the scope of the designated 10 questions, and I don't believe that 11 this subject of authorization to sign 12 the contract was even in dispute. 13 A I don't remember that. 14 Q Okay. So is it Eastern Profit's 15 position that at all times Guo was the agent of 16 Eastern Profit for purposes of negotiating the 17 contract? 18 MS. CLINE: Objection to form. 19 Mischaracterizes testimony. Calls 20 for a legal conclusion. 21 The court has already made an 22 observation about Mr. Guo's agency. 23 With respect to agency beyond that, 24 this witness isn't qualified to 25 answer from a legal perspective.</p>

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<p>1 YVETTE WANG 2 MR. GREIM: I would still like 3 the Eastern Profit's answer, and you 4 preserve your objection? 5 MS. WANG: Should I answer? 6 MS. CLINE: Go for it. 7 A I remember when I was negotiate -- 8 negotiating the terms of agreement, I did ask the 9 advice from Mr. Guo. 10 Q And did you ask anyone else when you 11 were negotiating on behalf of Eastern Profit for 12 advice? 13 A Mr. Gare Smith. 14 Q He's an attorney; right? 15 A Correct. 16 Q At the Foley Hoag Law Firm? 17 A Yes. 18 Q Other than Mr. Smith and Mr. Guo, did 19 you ask anyone else for advice when you were 20 negotiating the contract. 21 Don't include lawyers, please. 22 MS. CLINE: Objection to form. 23 A Should I? I don't remember I did. 24 Q Did you -- let me ask you this. 25 Do you recall testifying at your</p>	<p>1 YVETTE WANG 2 idea, who else came up with them? 3 A Mr. Guo devised most of the name, not 4 only 15. They are the name on Internet. And 5 almost everyone knows they are corrupted Chinese 6 communist party official. 7 Q Who on behalf of Eastern Profit 8 decided which 15 names would be given to Strategic 9 Vision? 10 A Based on the information on Internet, 11 I put together the name list, and I took the 12 advice from Mr. Guo. 13 Q I'm sorry. Did you identify any 14 names on your own? 15 MS. CLINE: Asked and answered. 16 A What's the question? 17 Q Did you identify any of the 15 names 18 on your own without the advice of Mr. Guo? 19 A I did. 20 Q So is it your testimony that you came 21 up -- let me go to this. 22 Do you recall giving a packet of 15 23 names to French Wallop and Mike Waller for 24 research purposes? 25 A I gave 15 names to Wallop to</p>
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<p>1 YVETTE WANG</p> <p>2 Objection.</p> <p>3 Your answer on line 7, No.</p> <p>4 8. How did Eastern Profit identify</p> <p>5 these individuals?</p> <p>6 Line 10, Answer: I don't know.</p> <p>7 You never asked? Answer: No.</p> <p>8 Question: Mr. Guo never said this is</p> <p>9 where we got this list of corrupt people?</p> <p>10 Answer: No.</p> <p>11 Did I read that correctly?</p> <p>12 A Yes.</p> <p>13 Q So today your testimony is that you</p> <p>14 do know how Eastern Profit identified the 15</p> <p>15 individuals?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 Q Your testimony is they got them off</p> <p>18 the Internet?</p> <p>19 MS. CLINE: Objection.</p> <p>20 A You've asking me one question or two</p> <p>21 questions, Eddie? What is the first question?</p> <p>22 Q Well, did you learn something knew</p> <p>23 between January and today about how you found the</p> <p>24 15 names?</p> <p>25 A No.</p>	<p>1 YVETTE WANG</p> <p>2 A What's the question?</p> <p>3 Q Let me do this.</p> <p>4 Other than you and Mr. Guo, who else</p> <p>5 supplied suggestions for this list of 15 names?</p> <p>6 A Some of the name, like I remember one</p> <p>7 guy among there's 15, he is the head of Chinese</p> <p>8 communist party police. He personally go after</p> <p>9 Mr. Han and Mei, their family in China.</p> <p>10 Q So --</p> <p>11 A I was told -- I didn't finish.</p> <p>12 Q I'm sorry. Go ahead.</p> <p>13 A I was told and mentioned quite a long</p> <p>14 time about these bad guys. So if you ask me</p> <p>15 anyone else give any advice, you could understand</p> <p>16 Mr. Han and Mei. They all have input because they</p> <p>17 mention to me their family were persecuted and</p> <p>18 threatened by someone already in the list.</p> <p>19 Q You might recall that -- well, you</p> <p>20 attended every deposition, almost every deposition</p> <p>21 in this case. You attended Mr. Guo's deposition;</p> <p>22 didn't you?</p> <p>23 A I did.</p> <p>24 Q Yes, you did. And do you recall</p> <p>25 Mr. Guo did not recognize the last five names on</p>
<p style="text-align: center;">Page 182</p>	<p style="text-align: center;">Page 184</p>
<p style="text-align: center;">Page 183</p>	<p style="text-align: center;">Page 185</p>

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<p>1 YVETTE WANG</p> <p>2 last five names come from?</p> <p>3 A Before I answer a question, Eddie,</p> <p>4 this pile was produced by Eastern before? Where</p> <p>5 did you get this?</p> <p>6 Q Hold on. Exhibit 12 was used at your</p> <p>7 deposition, and you testified that those are the</p> <p>8 names that you gave Strategic Vision. That's Wang</p> <p>9 Exhibit 12.</p> <p>10 A Can I see my transcript from my first</p> <p>11 deposition.</p> <p>12 Q Okay. Go to page 212, please.</p> <p>13 A 212.</p> <p>14 Q Look at the very bottom of 212 at</p> <p>15 line 23. Do you see my predecessor says: I'm</p> <p>16 going to hand you what has been marked as</p> <p>17 Exhibit 12 for your deposition.</p> <p>18 (Wang Exhibit 12, a Name List</p> <p>19 previously marked for Identification</p> <p>20 as of this date.)</p> <p>21 Answer: Thank you.</p> <p>22 Question: On the 213. Just flip</p> <p>23 through it and let me know when you're finished.</p> <p>24 It has production numbers SVUS 171 through 259.</p> <p>25 That's marked confidential and should remain</p>	<p>1 YVETTE WANG</p> <p>2 already Internet public information.</p> <p>3 Q Are there any names yet already</p> <p>4 whistle blowed on the Internet?</p> <p>5 It might have been bad grammar there.</p> <p>6 A You talk about this?</p> <p>7 Q Yes, the 15 names.</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A What's your question, Eddie?</p> <p>10 Q The question was are there any names</p> <p>11 in there that Mr. Guo, any of the 15 names that</p> <p>12 Mr. Guo had not already whistle blow -- whistle</p> <p>13 blown about on the Internet?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I have to tell you this is not my</p> <p>16 documents.</p> <p>17 Q Okay. My question though is are</p> <p>18 there any names in the 15 names that were not</p> <p>19 already whistle blown by Mr. Guo on the Internet?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A The 15 names I gave to Wallop, which</p> <p>22 I produced to my previous lawyer, Zack. They are</p> <p>23 the name Mr. Guo whistle blowed and other people</p> <p>24 whistle blowed also.</p> <p>25 They are the 15 names which I</p>
<p style="text-align: center;">Page 186</p>	<p style="text-align: center;">Page 188</p>

<p>1 YVETTE WANG</p> <p>2 confidential.</p> <p>3 Question: Have you ever seen this</p> <p>4 document before?</p> <p>5 Your answer at line 9: Yes.</p> <p>6 Question: What is it?</p> <p>7 Answer: They are on the name list.</p> <p>8 Question: Where did it come from?</p> <p>9 Answer: Mr. Guo.</p> <p>10 Question: Where did Mr. Guo get it.</p> <p>11 Answer: I don't know.</p> <p>12 Question: Did you ever talk to him</p> <p>13 about it?</p> <p>14 Answer: No.</p> <p>15 Did I read that correctly?</p> <p>16 A Yes.</p> <p>17 Q Okay. So my question to you is where</p> <p>18 did the last -- first of all, is it still your</p> <p>19 testimony at that all 15 names came from Mr. Guo?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 Mischaracterizes testimony.</p> <p>22 A Mr. Guo already whistle blowed almost</p> <p>23 all of these name on Internet. If you want to</p> <p>24 understand, all the name came from Mr. Guo. I'm</p> <p>25 talking about 15 names. You're right. But it's</p>	<p>1 YVETTE WANG</p> <p>2 recognized my list. I was given, if this is still</p> <p>3 the same pile, by your previous, previous</p> <p>4 colleague, Phillip. I forget that law firm. That</p> <p>5 firm sue your client for not paying legal fee.</p> <p>6 That gentleman, he gave me this pile.</p> <p>7 Did he not allow me to go through all the pages.</p> <p>8 Q So does Eastern Profit now deny that</p> <p>9 these are the 15 names?</p> <p>10 A You should check my lawyer's records,</p> <p>11 which I gave my lawyer the 15 name and compare</p> <p>12 with this pile which you are given by your client.</p> <p>13 They are not match. This is not my files.</p> <p>14 Q What are the 15 names that you gave</p> <p>15 to Strategic Vision?</p> <p>16 A My lawyer should have that.</p> <p>17 Q Miss Wang, you testified in your</p> <p>18 first deposition that Exhibit 12 were the 15</p> <p>19 names. Now you're saying that they're not.</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A I'm not saying they are not. I'm</p> <p>22 telling you 15 names, and you should touch base</p> <p>23 with my lawyer with that 15 names. This is not my</p> <p>24 file.</p> <p>25 Q I'm not asking whether it's your</p>
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<p>1 YVETTE WANG</p> <p>2 file. I'm asking whether it's the 15 names.</p> <p>3 A I can not testify on the file which</p> <p>4 is not my file. But I can confirm the 15 names</p> <p>5 which I gave my lawyer previously was Foley Hoag.</p> <p>6 Latter on was Zack. Right now it's Joanna. They</p> <p>7 have that 15 names. They are my name list which I</p> <p>8 will be able to testify.</p> <p>9 Q We're not going to call you back a</p> <p>10 third time. You've already sworn under oath that</p> <p>11 these are the 15 names. We can't keep doing this.</p> <p>12 So we will just rest on your prior sworn</p> <p>13 testimony. Let's --</p> <p>14 A It's very clear and all of this notes</p> <p>15 you already said it's not my notes, it's not my</p> <p>16 file, it's not mine.</p> <p>17 Q We'll have to decide what to do with</p> <p>18 this now changing testimony. I don't know what to</p> <p>19 do. I have no other records to show you.</p> <p>20 Have you brought anything for me</p> <p>21 showing what the 15 names are? Let's do this.</p> <p>22 Let me back up. Hold on.</p> <p>23 What does your list of the 15 names</p> <p>24 look like? Describe it to me.</p> <p>25 A Like the first name, yes, this is my</p>	<p>1 YVETTE WANG</p> <p>2 she believes the correct answer is,</p> <p>3 you're interrupting her having raised</p> <p>4 the topic yourself.</p> <p>5 So she can answer the question</p> <p>6 as best she's able.</p> <p>7 MR. GREIM: I asked her to be</p> <p>8 responsive, and nonresponsive</p> <p>9 descriptions are just a narrative.</p> <p>10 Q And just list the names for us</p> <p>11 please. So you've given us about five. Please</p> <p>12 keep going. I can't think of a better way to do</p> <p>13 this, so please go ahead.</p> <p>14 MS. CLINE: She's responding.</p> <p>15 Q Go ahead. Please continue.</p> <p>16 A Let me make this very clear. The 15</p> <p>17 name I give my lawyer, they may be included in</p> <p>18 this pile or not, which means I can help you to</p> <p>19 list I believe most of the name I listed, but</p> <p>20 maybe not all of them because I cannot repeat all</p> <p>21 of this pile. This is not my file. Okay?</p> <p>22 Shall I continue?</p> <p>23 Q Let me do this. Continue through the</p> <p>24 file, and I'm going to make sure I have your</p> <p>25 testimony as of today of who the 15 names were,</p>
<p style="text-align: center;">Page 190</p>	<p style="text-align: center;">Page 192</p>

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<p>1 YVETTE WANG 2 A I reply you before, I believe, but I 3 can repeat again. I put together name list. I 4 took advice from Mr. Guo. I put together name 5 list based on Internet whistle blow information. 6 And I'm aware, like some of the bad guy, they go 7 after Mr. Han and Miss Mei family in China. 8 So if you won't say anyone put 9 together that is my name list, I can tell you 10 maximal there's people. Q Now originally there were to be 10 names, and 5 were added; is that correct? A You're asking about negotiation of the contract terms? Q Yes, I am. A Kind of like, yes. Q What was the reason that five additional names were added? Let me ask you this. Did those five additional names have anything in common? A What do you mean in common? Q Well, for example did the same person recommend all five of the additional names? A The only thing -- MS. CLINE: Objection to form.</p>	<p>1 YVETTE WANG 2 than just to the best of your knowledge. I'm 3 asking Eastern Profit. 4 Did it engage anyone to research -- 5 anyone else other than Strategic Vision to 6 research any of these 15 names? 7 A Nope. Q What was the -- let me strike that. What was Eastern's plan for publicizing and using the information that Strategic Vision was supposed to obtain? A Of course to send this criminal person or criminal Chinese Communist Party officials into jail and to -- including Eastern Profit, the company, they're assets back. Q So Eastern Profit believed that the public outcry resulting from publicity would cause its assets to be unfrozen in Hong Kong? MS. CLINE: Objection to form. A There are some words I don't understand in your sentence. Archive, what is that? What's your question? Q So Eastern Profit believed that the public outcry -- A Wait a second. Public outcry, what's</p>
<p style="text-align: center;">Page 194</p> <p>1 YVETTE WANG 2 Sorry. Go ahead. 3 A The only thing in common is five 4 names, and 10 name, 15 name, they're all corrupted 5 Chinese Communist Party official, or their family, 6 or their like kids. I don't know that words. 7 Private case. And that is the only thing they're 8 in common. Q Other than with ACA, is there any other -- and I guess Mr. Guo, was there any other person with whom Eastern Profit intended to share the research results? A What's the question? Q Other than ACA and Mr. Guo, was there any other person with whom Eastern Profit intended to share the research results? MS. CLINE: Objection to form. A Eastern, of course, is happy to share the results. It was all Chinese people who are pursuing the rule of law and democracy of China. Q Did Eastern Profit engage anyone to research any of these 15 names, anyone other than Strategic Vision to research the 15 names? A To best of my knowledge, no. Q Okay. Now I want to ask you more</p>	<p style="text-align: center;">Page 196</p> <p>1 YVETTE WANG 2 this? Q You never heard outcry? Let me choose a different word? A Sorry. Foreigner here. MS. CLINE: No need for commentary. MR. GREIM: No one says she's a foreigner here. I don't understand the reason for the comment. MS. CLINE: She's not a native English speaking person. MR. GREIM: I'm trying to ask a question, please. Q So Eastern Profits? MR. GREIM: Please stop interrupting. Finally. Q So Eastern Profit's plan was that the public reaction to its publicizing this information would cause its assets to be unfrozen in Hong Kong? MS. CLINE: Objection to form. A Eastern Profits believes to disclosure this corrupted Chinese official, bring the justice to Chinese people, and itself also.</p>

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<p>1 YVETTE WANG 2 We'll be able to help all the Chinese 3 people and itself, including I'm frozen, Eastern 4 itself assets and back to normal business, which 5 Eastern was conducting before their bank accounts 6 was frozen. 7 Q So I just want to understand this. 8 This is the first time we're hearing about Eastern 9 Profit wanting to unfreeze its assets. 10 Did Eastern Profit believe that it 11 would put its own prosecutors in jail in Hong 12 Kong? Let me ask you this. 13 What was Eastern Profit's specific 14 plan to use the research in Hong Kong? 15 MS. CLINE: Objection. It's 16 Beyond the scope of your topics. 17 Q Well, the very first topic is why did 18 Eastern Profit enter into the contract. Question 19 number 1. That's what we're trying to find out. 20 We just learned it's to unfreeze its 21 assets. So I would like to know about the 22 specifics of this. 23 How specifically did Eastern Profit 24 believe it was going to be able to use the 25 research results to unfreeze its Hong Kong</p>	<p>1 YVETTE WANG 2 appearing on the list is why did EP 3 enter into the contract. The second 4 sentence is: What circumstances led 5 EP to seek research. 6 MR. PODHASKIE: Join. I'm -- 7 MR. GREIM: Please do not enter 8 into the record. 9 MS. CLINE: Which is the letter 10 you're referring to? 11 MR. GREIM: I'll just give you 12 a copy. This is my E-mail to you of 13 October 3rd, 2019. I attached a word 14 document. You can pass it over to 15 your attorney. 16 Let's go off the record. 17 MS. CLINE: No. Let's keep 18 going. 19 MR. GREIM: We're using up time 20 now. I think it's a spurious 21 objection. 22 THE VIDEOGRAPHER: Off the 23 record. 24 MS. CLINE: On the record. 25 Q So the question is: What was Eastern</p>
<p style="text-align: center;">Page 198</p> <p>1 YVETTE WANG 2 assets? 3 MS. CLINE: What was the 4 number 1 that you were just referring 5 to? 6 MR. GREIM: I'm referring you to 7 the long list, item 1, very first 8 question sent to you on August 13. 9 MS. CLINE: You're not referring 10 to the deposition notice; right? 11 MR. GREIM: No. Within the 12 deposition notice it's under research 13 agreement including negotiations 14 concerning the same. 15 Question 1: Why did EP enter 16 into the contract? 17 MS. CLINE: I mean the notice 18 topic is the research agreement and 19 negotiations. I will give you a 20 little leeway. 21 MR. GREIM: We're in between 22 counsel, which is supposed to be 23 honored by the court's order, which I 24 sent to you October 3rd is this list. 25 And the very first question</p>	<p style="text-align: center;">Page 200</p> <p>1 YVETTE WANG 2 Profit's specific plan to use the research to free 3 up its Hong Kong assets? 4 MS. CLINE: You're representing 5 that that question isn't on here? 6 MR. GREIM: No. It's the first 7 two questions. 8 Q Why did Eastern Profit enter into the 9 contract? You just learned for the first time 10 that it's to free up some frozen Hong Kong. 11 I'm trying to learn about the 12 specific plan that Eastern Profit had. 13 MS. CLINE: You're 14 mischaracterizing her testimony. If 15 you want to know why did Eastern 16 Profit enter into the contract, you 17 can ask her that question again. 18 You're twisting -- 19 MR. GREIM: I'm not limited to 20 using the exact words on that 21 document. I'm following up on the 22 witness' questioning, and I'm being 23 obstructed. 24 I would like to get an answer to 25 the question.</p>

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<p>1 YVETTE WANG 2 Q What was Eastern Profit's specific 3 plan to use the research results to unfreeze its 4 Hong Kong assets?</p> <p>5 MS. CLINE: Objection to form. 6 Mischaracterizes testimony and beyond 7 the scope of counsel's agreement 8 regarding the scope of the 9 deposition.</p> <p>10 You can answer.</p> <p>11 A I'm happy to tell you. I remember on 12 my name list there are two person. One is called 13 M-E-N-G, J-I-A-N, Z-H-U. He was the hat or steel 14 head of entire China, police, court, persecutor. 15 Almost -- most of the law enforcement. He's the 16 head of that. The most powerful person. One of 17 the most powerful person in China.</p> <p>18 Q And so you hoped --</p> <p>19 A Let me finish.</p> <p>20 Q You paused for so long, I thought you 21 were done.</p> <p>22 A I'm trying to help you.</p> <p>23 Q I'm sorry. Keep going.</p> <p>24 A I told you I have language barrier. 25 You have to allow me finish.</p>	<p>1 YVETTE WANG 2 sorry, PRC official? 3 A He is Chinese Communist Party 4 official, yes.</p> <p>5 Q So that's one person. You said there 6 was a second person. Who was that? 7 A The second person is Sun Li Jum. 8 S-U-N, L-I, J-U-M.</p> <p>9 Q Okay. Go ahead. 10 A I finished.</p> <p>11 Q I'm sorry. That time you were done. 12 Okay. 13 What was the plan with respect to 14 him? How was that going to unfreeze the assets? 15 A A similar plan.</p> <p>16 Q Anyone else in your list of 15 names 17 that were going to help unfreeze the Eastern 18 Profit assets in Hong Kong? 19 MS. CLINE: Objection to form. 20 A Everyone.</p> <p>21 Q Okay. How were ACA assets able to 22 flow out of Hong Kong? 23 MS. CLINE: Objection. Beyond 24 the scope. 25 MR. GREIM: Let's take a short</p>
<p style="text-align: center;">Page 202</p> <p>1 YVETTE WANG 2 Q I thought you were finished with the 3 sentence when a few seconds ticked by. Go on 4 ahead.</p> <p>5 A So clearly of Eastern's previous 6 directors, current directors, they were all 7 persecuted by this corrupted Chinese official. 8 So Eastern would like to disclosure 9 this corrupted Chinese official. His legal 10 assets, his crimes, et cetera to bring the justice 11 to China.</p> <p>12 And it should be a natural 13 understanding to Eastern and all the Chinese 14 people who are persecuted by this bad official. 15 If this official is completely 16 removed, sent to jail, and they will be able to 17 get their justice back including -- you know the 18 relationship between Hong Kong and Beijing; right? 19 You don't need me to explain that. That will 20 naturally bring justice to Hong Kong for Eastern 21 Profit to release his assets which were illegally 22 frozen.</p> <p>23 Q In Hong Kong? 24 A Correct. 25 Q And this Mr. Meng is a CCP or, I'm</p>	<p style="text-align: center;">Page 204</p> <p>1 YVETTE WANG 2 break. 3 THE VIDEOGRAPHER: The time is 4 4:39 p.m., Wednesday, October 30, 5 2019. This is the end of Media 4 in 6 the deposition of Yvette Wang. 7 We're off the record. 8 (At this time, a brief recess 9 was taken.) 10 THE VIDEOGRAPHER: The time is 11 4:56 p.m., Wednesday, October 30, 12 2019. 13 This is media number 5 of the 14 videotaped deposition of Missy Wong. 15 We're back on the record. 16 EXAMINATION CONTINUED 17 BY MR. GREIM: 18 Q Miss Wong, we're going to jump around 19 a little bit between some different topics and try 20 to wrap up today. 21 My first question is earlier we 22 talked about the Power of Attorney by which 23 Eastern Profit granted to Gold Spring, New York. 24 My question for you is who on behalf 25 of Eastern Profit authorized Han Chunguang to</p>

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<p>1 YVETTE WANG</p> <p>2 sign that Power of Attorney?</p> <p>3 MS. CLINE: Objection. I'm not</p> <p>4 sure that's within the scope.</p> <p>5 If you know the answer, you can</p> <p>6 answer.</p> <p>7 A I have, I believe, Miss Mei. M-E-I.</p> <p>8 Q Were any lenders, other than ACA,</p> <p>9 approached by Eastern Profit for purposes of this</p> <p>10 contract?</p> <p>11 MS. CLINE: Again, objection.</p> <p>12 Beyond the scope.</p> <p>13 A I didn't hear about that.</p> <p>14 Q In other words, did ACA try to find a</p> <p>15 competitive -- find competitive loan terms?</p> <p>16 A Find competitive loan terms?</p> <p>17 Q Right. In other words, did it see if</p> <p>18 it could find cheaper financing from somebody</p> <p>19 other than ACA?</p> <p>20 A You're asking do I know or not?</p> <p>21 Q My question is did Eastern Profit try</p> <p>22 to shop for the best loan terms it could?</p> <p>23 A I didn't hear about this.</p> <p>24 Q Does Eastern Profit have any plan to</p> <p>25 repay the loan other than getting its assets</p>	<p>1 YVETTE WANG</p> <p>2 So besides Eastern is looking for</p> <p>3 release their bank accounts from Hong Kong to pay</p> <p>4 back the loan, is there any other way Eastern</p> <p>5 planned to pay back?</p> <p>6 Q Correct.</p> <p>7 A Okay. I didn't discuss that yet, but</p> <p>8 I heard kind of like William would be happy to</p> <p>9 contribute this fund into the entire taking down</p> <p>10 Chinese Communist Party campaign. But I don't</p> <p>11 have too much details.</p> <p>12 Q So had the research been successful,</p> <p>13 Mr. Yu would have been happy to write off the</p> <p>14 loan?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 A Possible.</p> <p>17 Q Did Eastern Profit intend to keep</p> <p>18 borrowing from ACA for the rest of the contract?</p> <p>19 MS. CLINE: Objection to the</p> <p>20 form.</p> <p>21 A I think I replied to your question.</p> <p>22 Still the same answer. Possible.</p> <p>23 Q Did Eastern Profit hire T and M</p> <p>24 Security to research these names, any of these 15</p> <p>25 names?</p>
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<p>1 YVETTE WANG</p> <p>2 unfrozen in Hong Kong?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A What do you mean other than assets?</p> <p>5 Q Let me go back.</p> <p>6 So let's suppose that Strategic</p> <p>7 Vision -- I asked a question, not the same</p> <p>8 question, but a similar one earlier.</p> <p>9 Let's suppose Strategic Vision had</p> <p>10 given Eastern Profit all of the research it wanted</p> <p>11 for an entire year, for the entire term of the</p> <p>12 contract. Let's say that it happened.</p> <p>13 Did Eastern Profit have any plan to</p> <p>14 repay ACA's loan other than by effecting political</p> <p>15 change in China?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 Hypothetical.</p> <p>18 You can answer, if you can.</p> <p>19 A It's hard to understand your</p> <p>20 question. Still I don't quite understand your</p> <p>21 question. You mean F, Strategic Vision, they</p> <p>22 are -- which they are not, they are qualified to</p> <p>23 deliver the reports which agreed in the contract,</p> <p>24 which means the contract happened. I mean with</p> <p>25 merits or with facts happened.</p>	<p>1 YVETTE WANG</p> <p>2 A No.</p> <p>3 Q Did it hire Robert Tucker or Dunkin</p> <p>4 Levitt to research any of these 15 names?</p> <p>5 A No.</p> <p>6 Q Did Eastern Profit expend any money</p> <p>7 in coming up with its list of 15 names?</p> <p>8 A I don't understand the question.</p> <p>9 Sorry.</p> <p>10 Q Did Eastern Profit -- so you've</p> <p>11 testified that you and Mr. Guo came up with a list</p> <p>12 of 15 names, and that you considered various</p> <p>13 factors.</p> <p>14 My question to you is did Eastern</p> <p>15 Profit spend any money in developing its list of</p> <p>16 15 names?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Spend any money in developing my name</p> <p>19 at least; right?</p> <p>20 Q Correct.</p> <p>21 A If you are talking about Eastern's</p> <p>22 assets were frozen, they could not continue their</p> <p>23 normal business. The damage should be count as</p> <p>24 cost to spend.</p> <p>25 Q I'm sorry. My question was did</p>
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<p>YVETTE WANG</p> <p>Eastern Profit spend money in developing the list of 15 names?</p> <p>MS. CLINE: Objection to form.</p> <p>A I don't know, but I will say no.</p> <p>Q Did Eastern Profit spend any money to develop the supporting materials it provided to Strategic Vision along with the 15 names?</p> <p>MS. CLINE: Objection to form.</p> <p>A The 15 names, they are public, international. No, international information. Why Eastern Profits should spend money to the American names, should spend money to build the list.</p> <p>Q That's my question to you. Did it?</p> <p>A I believe I reply to your question with my question.</p> <p>Q But I would like an answer.</p> <p>MS. CLINE: Asked and answered.</p> <p>A No. It's public Internet information. Let me repeat again. Everyone has access.</p> <p>Q Was Eastern Profit aware that Guo had hired researchers to investigate the same 15 names that Strategic Vision was researching?</p>	<p>YVETTE WANG</p> <p>Wallop to have Strategic Vision send the money back to ACA?</p> <p>A Yes. I asked Wallop.</p> <p>Q Why did you ask her to send the money back to ACA instead of to Eastern Profit?</p> <p>MS. CLINE: Objection. To the extent all this stuff was asked in the first deposition, and now we're reinventing wheels again.</p> <p>You can answer.</p> <p>A Eastern Profits bank account is frozen. How can Eastern be able to receive refund, return, let's say. Sorry about my language. Return of money.</p> <p>Q What is the latest conversation you've had with ACA or William Je about the million dollars?</p> <p>MS. CLINE: Objection. Asked and answered.</p> <p>A Latest conversation, you mean the last conversation today?</p> <p>Q The most recent, yes.</p> <p>A Last month.</p> <p>Q Okay.</p>
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<p>1 YVETTE WANG</p> <p>2 United States, the director of -- the sole 3 director of Eastern Profit, is she in this 4 country?</p> <p>5 MS. CLINE: I object to that. 6 That's not relevant to anything 7 that's within the scope.</p> <p>8 Q We know now that she has relevant 9 information. We just learned today for the first 10 time.</p> <p>11 I'd like to know whether the director 12 of Eastern Profit, the top dog, is in the United 13 States. Is she?</p> <p>14 A What do you mean top dog? 15 Q Forget it. I'm sorry.</p> <p>16 Is Guo Mei in the United States?</p> <p>17 A I don't know.</p> <p>18 Q Does she reside in New York?</p> <p>19 A I don't know.</p> <p>20 Q When was the last time you reported 21 to her about this case?</p> <p>22 MS. CLINE: Objection to the 23 form.</p> <p>24 A Report? What do you mean report? 25 Q When is the last time you talked to</p>	<p>1 YVETTE WANG</p> <p>2 drive with files on there; correct? It was in a 3 PDF; wasn't it?</p> <p>4 A Correct.</p> <p>5 Q Who created the PDF?</p> <p>6 A I did.</p> <p>7 Q And did you cut and paste from the 8 Internet, did you create a word document and print 9 it to PDF.</p> <p>10 How did you create the PDF?</p> <p>11 A You're asking how did I create a PDF?</p> <p>12 Q Yes.</p> <p>13 A I don't remember that either like 14 word or PowerPoint, and then transfer.</p> <p>15 Q All of the information that you 16 included in the document that eventually became a 17 PDF was information that you found on the 18 Internet?</p> <p>19 A What's the question?</p> <p>20 Q All of the information that you 21 included on the document that eventually became 22 the PDF was information you found on the Internet?</p> <p>23 A Devised by Mr. Guo.</p> <p>24 Q Did Mr. Guo provide you any data that 25 you included into the PDF document?</p>
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<p>1 YVETTE WANG 2 Q Take away. 3 A You mean before I gave to Wallop? 4 Q Yes. 5 A I don't think so. 6 Q Did Eastern Profit plan to share the 7 existence of the research agreement or any of its 8 results with anyone in the CCP? 9 A You're asking about Eastern; right? 10 You're asking about Eastern; right? 11 Q Correct. I didn't hear that from 12 Eastern. 13 Did ACA tell Easter that it planned 14 to share the contract's existence or any of the 15 rules of the research with the CCP? 16 MS. CLINE: Again, the agreement 17 we had as to ACA, it's irrelevant. 18 The agreement we had with ACA had to 19 do with the loan, the negotiation of 20 the loan, the drafting of the 21 document. This is beyond the scope. 22 MR. GREIM: The intended sharing 23 of the results of the research is 24 within the scope. 25 MS. CLINE: Not with respect to </p>	<p>1 YVETTE WANG 2 in Hong Kong about the negotiation of the research 3 contract? 4 MS. CLINE: Objection to the 5 form. 6 A About research agreement? 7 Q Right. 8 A Who did I communicate with Hong Kong? 9 Q Right. 10 A I don't remember I talk with anyone 11 in Hong Kong about this agreement. I don't 12 remember now. 13 Q Do you recall telling Miss Wallop 14 that you had to check with Hong Kong on the 15 contract negotiations? 16 A Can I see the transcript? 17 Q We don't have a recording of you 18 talking to Miss Wallop. 19 A I don't remember I say that. 20 Q Do you recall that you said that 21 rather than reporting to Mr. Guo, you report to 22 Golden Spring, Hong Kong? 23 A Can I see the transcript? 24 Q You may. If you look at page 20. 25 A My first transcript; right? </p>
<p style="text-align: center;">Page 218</p> <p>1 YVETTE WANG 2 ACA. 3 MR. GREIM: No. No. There's 4 not a special carve out that ACA is 5 going to share the results. We don't 6 get asked about it. 7 Q Did ACA indicate that to Eastern 8 Profit? 9 MS. CLINE: Same objection. 10 A I never hear about this. Why? 11 Q Do you recall telling Mr. Waller that 12 you were conferring with investors into the 13 research project? 14 A Yes, I did. 15 Q Who were those investors? 16 MS. CLINE: The scope of the 17 questioning is limited to investors 18 in this research contract. 19 A I refer the people who are persecuted 20 and threatened by Chinese Communist Party. 21 Q Because those people were going to be 22 receiving the results of the research? 23 MS. CLINE: Objection to form. 24 A I didn't say that. 25 Q Okay. Who did you communicate with </p>	<p style="text-align: center;">Page 220</p> <p>1 YVETTE WANG 2 Q Correct. Line 6. 3 Question: Does Mr. Guo tell you what 4 to do when you're working on behalf of Golden 5 Spring? 6 Answer: No. 7 Question: Who does? 8 Answer: China Golden Spring Group, 9 Hong Kong, Limited. 10 Question: Where are they located? 11 Answer: Hong Kong. 12 Did I read that correctly? 13 A Yes. 14 MS. CLINE: I lodge an objection 15 to the line of inquiry. These are 16 questions that relate to her capacity 17 as a representative of Golden Spring. 18 She's here as a representative of 19 Eastern Profit. 20 Q Right. Your testimony before was on 21 behalf of Eastern Profit; correct? 30(b)(6) on 22 behalf of Eastern Profit? 23 A You're talking about today? 24 Q No. In January when you testified 25 what I just read to you. </p>

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<p>1 YVETTE WANG</p> <p>2 A Are you talking about first</p> <p>3 deposition?</p> <p>4 Q Yes. Do you recall that you were a</p> <p>5 30(b)(6) witness before?</p> <p>6 A I should be.</p> <p>7 Q Did you confer with Mr. Je, I say it</p> <p>8 different every time, about the research agreement</p> <p>9 in this case in December of 2017?</p> <p>10 A December of 2017 Mr. Je?</p> <p>11 Q Correct.</p> <p>12 A Who is Mr. Je?</p> <p>13 Q Well, Mr. Yu.</p> <p>14 A You're talking about William.</p> <p>15 Q I am. William. I should just call</p> <p>16 him William probably.</p> <p>17 A Much easier. Talk to him about what?</p> <p>18 Q About the research agreement?</p> <p>19 A I didn't remember that.</p> <p>20 Q How about in January, 2018?</p> <p>21 MS. CLINE: Again, our agreement</p> <p>22 regarding the scope of questioning</p> <p>23 about ACA was limited to the</p> <p>24 negotiations of the loan.</p> <p>25 Q My question is is one of the people</p>	<p>1 YVETTE WANG</p> <p>2 A Ask William by when, January 2018?</p> <p>3 Q Sure. December, 2017 or January,</p> <p>4 2018.</p> <p>5 A I don't remember.</p> <p>6 Q Does Eastern Profit report on the</p> <p>7 progress of this case to William Yu?</p> <p>8 MS. CLINE: Objection. Form.</p> <p>9 A Does Eastern Profit? If you are</p> <p>10 talking about the previous director and the</p> <p>11 current director, no, because these two people</p> <p>12 fully authorized everything to me. They don't</p> <p>13 know the details. They're not involved. If you</p> <p>14 are talking about me, mention what to William?</p> <p>15 Q The progress of this case.</p> <p>16 A Yeah, I mentioned the progress of</p> <p>17 this case to him. Yeah.</p> <p>18 MR. GREIM: Can I ask -- I think</p> <p>19 I'm done here.</p> <p>20 Can I ask that the witness</p> <p>21 produce her copy of the 15 names to</p> <p>22 counsel and that they just be</p> <p>23 produced to us?</p> <p>24 MS. CLINE: We will take that</p> <p>25 under advisement?</p>
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<p>1 YVETTE WANG</p> <p>2 that you were conferring with for direction as you</p> <p>3 were negotiating the contract with Strategic</p> <p>4 Vision William Yu?</p> <p>5 A Conferring what? I --</p> <p>6 Q Talking to.</p> <p>7 A Okay. Talking to William about.</p> <p>8 Q Correct, the research.</p> <p>9 A The research agreement.</p> <p>10 Q Right.</p> <p>11 A When? By January --</p> <p>12 Q January, 2018.</p> <p>13 A 2018.</p> <p>14 Q Yes.</p> <p>15 A I don't remember.</p> <p>16 Q Did you ask for his advice in any of</p> <p>17 the 15 names?</p> <p>18 A Ask William; right?</p> <p>19 Q Correct.</p> <p>20 A No.</p> <p>21 Q Did you check with him to determine</p> <p>22 whether getting information on these names would</p> <p>23 help to unfreeze Eastern Profit's assets in Hong</p> <p>24 Kong?</p> <p>25 MS. CLINE: Objection.</p>	<p>1</p> <p>2 MR. GREIM: Okay.</p> <p>3 I know what you've said here</p> <p>4 today, but I believe that was what we</p> <p>5 had. I'll just make the request and</p> <p>6 you can take it under advisement.</p> <p>7 I don't have any other questions</p> <p>8 for the witness.</p> <p>9 We're off the record. The</p> <p>10 deposition is concluded.</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 5:28 p.m. Wednesday, October 30,</p> <p>13 2019. This is the end of media</p> <p>14 number 5 and completes the videotaped</p> <p>15 deposition of Miss Yvette Wang.</p> <p>16 We're off the record.</p>
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2
3 **A C K N O W L E D G M E N T**
4

5 **STATE OF NEW YORK)**
6 **ss:**
7 **COUNTY OF _____)**
8

9 I, Yvette Wang, hereby certify that I have
10 read the transcript of my testimony taken under
11 oath in my deposition of October 30, 2019; that
12 the transcript is a true and complete record of my
13 testimony, and that the answers on the record as
14 given by me are true and correct.
15

16
17 _____
18 **YVETTE WANG**
19

20
21 Subscribed and sworn to before me
22 This day of 2019
23

24 _____
25 **(NOTARY PUBLIC)**

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2
3 **C E R T I F I C A T E**
4

5 I, Terri Fudens, a stenotype reporter
6 and Notary Public within and for the State of New
7 York, do hereby certify:

8 That the witness whose testimony is
9 hereinbefore set forth was duly sworn by me and
10 that such testimony is a true record of the
11 testimony given by such witness.

12 I further certify that I am not related
13 to any of the parties by blood or marriage, and
14 that I am in no way interested in the outcome of
15 this matter.

16 IN WITNESS WHEREOF, I have hereunto set
17 my hand.
18

19
20 _____
21 **Terri Fudens**
22
23
24
25

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30(b)(6) Yvette Wang
October 30, 2019

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30(b)(6) Yvette Wang
October 30, 2019